

BellSouth Telecommunications, Inc.

615 214-6301 Fax 615 214-7406 Guy M. Hicks

Suite 2101

333 Commerce Street

Nashville, Tennessee 37201-3300

General Counsel

May 5, 2000

VIA HAND DELIVERY

David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37238

Re: Petition of MCI WorldCom to Enforce Interconnection Agreement with BellSouth

Docket No. 99-00662

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Responses to MCI's First Interrogatories and Requests for Production of Documents. Attachments to certain of the responses contain proprietary information. That information will be provided upon the entry of an acceptable Protective Order. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

Guy M. Hicks

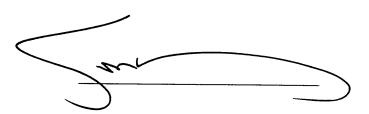
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CERTIFICATE OF SERVICE

I hereby certify that on May 5, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

Mail Facsimile Overnight	Richard Collier, Esquire Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0500
Hand Mail Facsimile Overnight	Henry Walker, Esquire Boult, Cummings, et al. 414 Union Ave., #1600 P. O. Box 198062 Nashville, TN 39219-8062



BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 1 Page 1 of 1

REQUEST: Identify all persons who have knowledge or information concerning the

facts set forth in MCI WorldCom's Complaint and BellSouth's responsive pleadings and provide a general description of each person's knowledge.

RESPONSE Jerry Hendrix, Senior Director, Interconnection Services, and David

Scollard, Manager, BellSouth Billing. Mr. Hendrix's and Mr. Scollard's knowledge of the case will be discussed in their testimony to be filed in

this docket.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 2 Page 1 of 1

REQUEST: Does BellSouth serve ESPs, including ISPs, in Tennessee?

a. Please identify any ESPs served by BellSouth in Tennessee.

RESPONSE: Yes. BellSouth serves ESPs, including ISPs in Tennessee.

a. BellSouth objects to this interrogatory on grounds that the information requested is not relevant to any issue in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. BellSouth also objects to this request because the information sought is proprietary, the disclosure of which to a competitor such as MCI WorldCom would be detrimental to BellSouth. Subject to these objections, and without waiving these objections, BellSouth will produce the telephone numbers of ESPs served by BellSouth in Tennessee only upon the entry of an acceptable protective order.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 3 Page 1 of 2

REQUEST: Does BellSouth serve its ESP customers in Tennessee out of its interstate or intrastate tariffs?

a. State whether BellSouth's method of serving such customers under either interstate or intrastate tariffs has changed at any time since January 1, 1996; if so, why did it change, how did it change and when did it change?

RESPONSE:

As mandated by the FCC, BellSouth serves and bills its ISP customers from intrastate tariffs. BellSouth's compliance with the FCC billing requirements is not discretionary and in no way manifests an intent by BellSouth as to the reciprocal compensation provisions of the interconnection agreement. In short, ISP traffic is an interstate service billed at local rates at the sole insistence of the FCC.

BellSouth, by FCC Order, permits ISPs to pay business line rates for ISP traffic, instead of the interstate access rates that BellSouth would normally bill. In its First Report and Order, In the Matter of Access Charge Reform, CC Docket No. 96-262 (May 16, 1997), the FCC noted that:

As a result of the decisions the Commission made in the Access Charge Reconsideration Order, ISPs may purchase services from incumbent LECs under the same intrastate tariffs available to end users. ISPs may pay business line rates and the appropriate subscriber line charge, rather than interstate access rates, even for calls that appear to traverse state boundaries. (First Report and Order, In the Matter of Access Charge Reform, at ¶ 342.)

Thus, the FCC declined to allow ILECs to assess interstate access charges on ISPs for what the FCC defined as interstate calls.

There has been no change in BellSouth's method of serving such customers under either interstate or intrastate tariffs since January 1, 1996, because there has been no change in the FCC's rules.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 4 Page 1 of 1

REQUEST:

Does BellSouth treat revenues and expenses associated with its services to ESPs as interstate or intrastate for separations and ARMIS reporting purposes?

- Has BellSouth's treatment of revenues and expenses associated a. with services provided to ESPs for those purposes changed at any time since January 1, 1996.
- b. If it has, for each instance, why did it change, how did it change and when did it change?

RESPONSE: The separations process is governed by Part 36 of the FCC rules, which BellSouth is required to follow. BellSouth's compliance with FCC rules is not discretionary and in no way manifests an intent by BellSouth as to the reciprocal compensation provisions of the interconnection agreement. Despite ruling that ISP traffic is interstate, the FCC in its recent Order directed local exchange carriers to continue to record ISP traffic as intrastate until it concludes its rulemaking regarding inter-carrier compensation.

> For ARMIS purposes (43-01 and 43-04 Reports), BellSouth reported minutes-of-use, costs and revenues for dial-up traffic to ISPs to the intrastate jurisdiction. The jurisdictional assignment of revenues and corresponding minutes-of-use follow the tariffs for those services. Costs allocated in accordance with the FCC Part 36 rules based on traffic usage follow the minutes-of-use assignment. Other costs, such as subscriber line costs, are reported in ARMIS 43-01 and 43-04 based upon the Basic Allocation Factor or direct assignment to the appropriate jurisdiction.

> There has been no change in BellSouth's treatment of such revenues and expenses for separations and ARMIS reporting purposes because there has been no change in the FCC's rules.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 5 Page 1 of 1

REQUEST:

When a BellSouth telephone exchange customer calls a BellSouth-served ESP within that caller's local calling area, does BellSouth treat the call as a local call pursuant to its intrastate tariffs or as a long distance call pursuant to interstate tariffs?

RESPONSE:

BellSouth "treats" calls to ESPs pursuant to its intrastate tariffs for pricing purposes as it was ordered to by the FCC; therefore, BellSouth serves ESPs out of its local tariffs in order to comply with the FCC's own order. (However, BellSouth's FCC Tariff No. 1 (Interstate Switched Access Tariff), Sec. 3.5.3 contains the access charge exemption.) The FCC also requires that the revenues collected from the ESPs be counted as intrastate revenues; therefore, BellSouth, in order to comply with the law, counts these revenues as intrastate. This is the only revenue that BellSouth receives for ESP-bound traffic. BellSouth is not compensated by the end user for the ESP-bound traffic, as it would be for local traffic, because local exchange rates do not take into account and compensate for non-local traffic such as ESP-bound traffic. Characteristics of ESP-bound traffic were never considered when local rates were established.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 6 Page 1 of 1

REQUEST:

If any of BellSouth's customers with message unit or per minute rated service were to call an ESP, would BellSouth include such calls to ESPs in local telephone charges?

- a. Does BellSouth have such customers?
- b. If it does, does it include such calls in local telephone charges?

RESPONSE:

- a. Yes, BellSouth has such customers.
- b. The information requested is not readily available. BellSouth states, however, that it is a reasonable assumption that end users on a minute rate service would not call an ESP due to the per minute charges that would accrue. Presumably, most are on a metered plan in order to reduce their monthly bills because they make far less use of the phone system for local calls than the average user does. It is simply unreasonable to assume that these customers are using their limited minutes of use for calls to enhanced services, particularly to the Internet, and it wouldn't be economically rational for BellSouth to separate the few calls that might be made to an ESP from a metered phone.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
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MCI WorldCom's 1st Request for Production
April 14, 2000
Item No. 6 **ATTACHMENT**

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1. Instructions

RF-XXXX (5.97)

CRIS/CABS Work Request

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5."D	Description of Business Objecti	ve (Req	uester)				
5a.	What has generated the need for this New/Enhanced Product/Service	change/v	work? Please check (X National Standards	the app	Customer Services	X	Internal/Infrastructure
5b.	General Description of Business Objective Describe possible alternatives/option Describe Current Process. (If services)	s/manual	workarounds. htly being performed, d	lescribe l	how is it done.)		
wit	ork request is to identify CLEC thin the BST IntraLata Networl arged nor billed to the CLEC pr	k. These	e calls are to be m	inate t arked :	o an Internet Servionsuch that the minute	ce Prov tes of u	ider (ISP) numbers, usage (MOU) will not be
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5c.	Other Considerations of Business Obj	ectiv e					

Work report is for the development of necessary files and reports to identify this usage on a monthly calendar

basis by state and CLEC originated provider.

6a. Low: Propers improvement

6. Business Impact (Requester/Billing Program Director/Sponsor) 6a. Expense/Revenue Impact Complete all that apply. Projected Revenue (Annual Amount) Projected Expense Reduction (Annual Amount) 6b. Prioritization Criteria Check (X) all that apply. For Mandated and High Ratings, provide rationale in 6c below. For items 1a, 1b, and 1c, attach a copy of the mandate. For Items 4d, 4e, and 4f, document the \$ amount of revenue generation, expense reduction, and/or head count savings. 2DD FOR CABS USE ONLY: Enter 3 Character Prioritization Code. See Job Aid for details. 1a. Mandated: Legal/PSC/FCC Mandate (written or verbal) 1b. Mandated: Corporate and PSC/FCC Joint Agreement X 1c. Mandated: Approved Tariff 2a. PON (Purchase Order Number) Contractual Obligations (Authorized)) 2b. PON (Purchase Order Number) Contractual Obligations (Pending Authorization) 3a. Corporate Initiatives: Corporate Dictate from EPC or Board of Directors 4a. High: Audit Findings 4b. High: Officer Priority 4c. High: Other Contractual Agreements 4d. High: Revenue Generation or Revenue Protection At RISK: 4e. High: High Expense Reduction At RISK: 4f. High: OA Initiatives Head Count: 4g. High: Customer Commitment 4h. High: Billing Integrity 4i. High: Customer Satisfaction 5a. Medium: Process Improvement 000002

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NOTE: High expense reduction > = \$400,000 or > = 5 FTE's

Medium expense reduction < \$400,000 and > = \$200,000 or < 5 FTE's and > = 2 FTE's

Low expense reduction < \$200,000 or < 2 FTE's

(5-97)

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x	Short/	Long T	erm Impact	If there are any specific short/lon					
			Dependencies	dependent on this one, list and e	xplain.				or if there are any other Work Requests
6e. S	pecial C	onside	rations for Prioritiza	tion Rationale and Comments Prov	ride details	of all i	tems c	hecke	d in 6d.
By ide	entifying	ISP d	ialed calls from an C	LEC and removing these MOU mes	ssages from	n charg	es bill	d to t	he CLEC. Legal requirements - see
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DOC

7c. Preliminary Requirements (Detailed Statements/Information for Requested Process/System Changes)

Description: Create programming to use a table to be populated with Internet Service
 Provider (ISP) numbers defined down to the NPA NNX-XXXX level. Table is to be easily accessible for update and maintenance by CBS, not hard coded.

Pass all local CLEC originated BST terminated traffic through new table to screen the terminating number to determine if number is ISP, if ISP mark the record as non-billable usage by assigning error code (SM) to record, and setting a unique indicator in the MAS 400 record.

Inputs: Input Data for table update will be manual or mechanical in nature, this is yet to be determined.

Outputs & Effects: Identification of dialed ISP calls will be marked uniquely and dropped from CLEC billing.

Constraints & Error Conditions:

Performance Impacts:

2. Description:

Test Cases:

Inputs

Triggers:

Outputs & Effects:

Constraints & Error Conditions:

Performance Impacts:

NOTE: To add another requirement, select 'unprotect document', enter the password 'save', click outside the right margin of the previous section and press enter.

Glossary (definitions/terms/acronyms):

B. Approvals		
8a. Approval Signatures (Requester and Billing Program Director/Sponsor) Signatures of both Requester and Billing Program Director/Sponsor are required prior to	submitting request to CRIS/CABS	i
Requester 'Wayne Fleming/Bob Cummingham	Date	7/2/97
Billing Frugram Director/Sporisor Barbara Olsen	Date	7/2/97
8b. Approval for Work or for T&C Please check (X) the appropriate boxes:		

This request is approved and covered by the Cost Object/Initiative shown in 4a.

x This is to request a non-binding Time & Cost (T&C) estimate only.

NOTE: Attach other documents electronically if possible.

Dated: 09/11/97 at 16:26 MESSAGE

Subject: Retention of ISP/ESP Messages Sender: Sheri C. Irvin / AL, BRHM06 PHONE-1=205 321-4410;

Part 1

FROM: Sheri C. Irvin / AL, BRHM06

TO: Elizabeth H. Carnes / AL, BRHM09

ERIC CASTILLO / NOTES

DDT1=HPNOTES; DDV1=ERIC CASTILLO@BCI;

Part 2

Guys,

remember the emails I sent stating that Eric's team need to decide about deleting the ISP usage??? Welll11111, I just discovered that Jim has sent it back to CBS (see attached), so I guess for now, we can forget it on Eric's team.

I'll keep you posted as FYI.

Sheri

Part 3

Dated: 09/11/97 at 16:10 Forwarded MESSAGE Contents: 2

Subject: Retention of ISP/ESP Messages Sender: Susan H. Claytor / AL, BRHM07 PHONE-1=205-321-2806;

Part 3.1

TO: Sheri C. Irvin / AL, BRHM06 PHONE-1=205 321-4410;

Part 3.2

Dated: 09/11/97 at 14:45 Forwarded REPLY Contents: 4

Subject: Retention of ISP/ESP Messages Sender: Susan H. Claytor / AL, BRHM07 PHONE-1=205-321-2806;

Part 3.2.1

TO: David L. Hollett / AL, BRHM07 PHONE-1=205-321-3736;

CC: Barbara Z. Bradley / AL, BRHM07 PHONE-1=205-321-4402;

Susan H. Claytor / AL, BRHM07

PHONE-1=205-321-2806;

Bob J. Cunningham / AL, BRHM09 PHONE-1=205-321-1400;

Larry E. Glover / AL, BRHM06 PHONE-1=205-321-3730;

Part 3.2.2

Dave.

The usage is being dropped and "trapped" in LARIES, but I really think there needs to be some reports developed showing by carrier how much was excluded from the bill, and that report needs to be available to the ICSC. If there is a need to retain data for possible future billing, it also seems like we would want that data captured and retained in IT. Bob/Barbara,

Please get with me to discuss your thoughts and then I will respond to

=->Susan:

```
=->I need your feedback on Jim's message attached.
=->If his statements about dumping the usage are correct, then I am
=->are dropping the usage. It is my understanding that dropped usage
assuming we
can be saved
=->to a file for future use, reporting, etc. If this is what we are
doing, then
=->there probably is no need to submit a work request to IT for any
additional
=->functionality except for the ability to re-enter the usage to the
=->stream to be able to bill it back to the appropriate CLECs. This
latter
=->functionality may be part of our existing billing capabilities.
=->Please go ahead and respond back to Jim for me unless there are some
=->significant issues we need to talk through first.
=->
=->Thanks,
=->
=->Dave
=->
Part 3.2.3
Susan:
I need your feedback on Jim's message attached.
If his statements about dumping the usage are correct, then I am assuming we
are dropping the usage. It is my understanding that dropped usage can be saved
to a file for future use, reporting, etc. If this is what we are doing, then
there probably is no need to submit a work request to IT for any additional
functionality except for the ability to re-enter the usage to the billing
stream to be able to bill it back to the appropriate CLECs. This latter
functionality may be part of our existing billing capabilities.
Please go ahead and respond back to Jim for me unless there are some
 significant issues we need to talk through first.
 Thanks,
 Dave
 Part 3.2.4
                                                         Dated: 09/11/97 at 10:17
 Forwarded MESSAGE
                                                                       Contents: 2
 Subject: Retention of ISP/ESP Messages
 Sender: James H. Childress / AL, BRHM07
                 FRONE-1=404-927-7560;
 Part 3.2.4.1
   TO: David L. Hollett / AL, BRHM07
                       PHONE-1=205-321-3736;
   CC: Barbara Z. Bradley / AL, BRHM07
                       PHONE-1=205-321-4402;
       Jim Brinkley / AL, BRHM04
                       PHONE-1=404-927-7520;
       Susan H. Claytor / AL, BRHM07
                       PHONE-1=205-321-2806;
       Bob J. Cunningham / AL, BRHM09
                       PHONE-1=205-321-1400;
```

Part 3.2.4.2

Dave,

Thanks to the efforts of your folks and IT, I understand that BST is now able

to exclude ISP/ESP traffic from our billing process. This action enables us to adhere to our side of the August policy letter to the CLECs where BST takes the position of neither paying for nor billing ISP/ESP usage. Because we had to put this in place so quickly, I also understand it has very little functionality and in fact just dumps the usage rather than storing it.

There is definitely a corporate need to track and store by CLEC the ISP/ESP usage excluded from the billing process. If BST loses this issue and is forced to pay the ISP/ESP invoices, we will want to bill the CLECs for the usage we have excluded. In addition, since we are studying the content of the traffic on our invoices closely, we can assume that the CLECs will be doing the same thing. Without the ability to track the excluded usage by CLEC, there will be no way to demonstrate what volumes we are talking about.

I'd like for CBS to develop an IT work request to provide the functionality discussed above. Please call me at 404-927-7560 so we can discuss this further.

Jim

Dated: 09/11/97 at 16:10 MESSAGE Contents: 2 Subject: Retention of ISP/ESP Messages Sender: Susan H. Claytor / AL, BRHM07 PHONE-1=205-321-2806; Part 1 TO: Sheri C. Irvin / AL, BRHM06 PHONE-1=205 321-4410; Part 2 Dated: 09/11/97 at 14:45 Forwarded REPLY Contents: 4 Subject: Retention of ISP/ESP Messages Sender: Susan H. Claytor / AL, BRHM07 PHONE-1=205-321-2806; Part 2.1 TO: David L. Hollett / AL, BRHM07 PHONE-1=205-321-3736; CC: Barbara Z. Bradley / AL, BRHM07 PHONE-1=205-321-4402; Susan H. Claytor / AL, BRHM07 PHONE-1=205-321-2806; Bob J. Cunningham / AL, BRHM09 PHONE-1=205-321-1400; Larry E. Glover / AL, BRHM06 PHONE-1=205-321-3730; Part 2.2 Dave. The usage is being dropped and "trapped" in LARIES, but I really think there needs to be some reports developed showing by carrier how much was excluded from the bill, and that report needs to be available to the ICSC. If there is a need to retain data for possible future billing, it also seems like we would want that data captured and retained in IT. Bob/Barbara, Please get with me to discuss your thoughts and then I will respond to Jim. =->Susan: =-> =->I need your feedback on Jim's message attached. =->If his statements about dumping the usage are correct, then I am assuming we =->are dropping the usage. It is my understanding that dropped usage can be saved =->to a file for future use, reporting, etc. If this is what we are doing, then =->there probably is no need to submit a work request to IT for any additional =->functionality except for the ability to re-enter the usage to the billing =->stream to be able to bill it back to the appropriate CLECs. This latter =->functionality may be part of our existing billing capabilities. =->Please go ahead and respond back to Jim for me unless there are some =->significant issues we need to talk through first. =->Thanks, =-> =->Dave =-> Part 2.3

Susan:

I need your feedback on Jim's message attached.

If his statements about dumping the usage are correct, then I am assuming we are dropping the usage. It is my understanding that dropped usage can be saved to a file for future use, reporting, etc. If this is what we are doing, then there probably is no need to submit a work request to IT for any additional functionality except for the ability to re-enter the usage to the billing stream to be able to bill it back to the appropriate CLECs. This latter functionality may be part of our existing billing capabilities.

Please go ahead and respond back to Jim for me unless there are some significant issues we need to talk through first.

Thanks,

Dave

Part 2.4

Forwarded MESSAGE
Subject: Retention of ISP/ESP Messages
Sender: James H. Childress / AL, BRHM07
PHONE-1=404-927-7560;

Part 2.4.1

TO: David L. Hollett / AL, BRHM07 PHONE-1=205-321-3736;

Part 2.4.2

Dave,

Thanks to the efforts of your folks and IT, I understand that BST is now able to exclude ISP/ESP traffic from our billing process. This action enables us to adhere to our side of the August policy letter to the CLECs where BST takes the position of neither paying for nor billing ISP/ESP usage. Because we had to put this in place so quickly, I also understand it has very little functionality and in fact just dumps the usage rather than storing it.

There is definitely a corporate need to track and store by CLEC the ISP/ESP usage excluded from the billing process. If BST loses this issue and is forced to pay the ISP/ESP invoices, we will want to bill the CLECs for the usage we have excluded. In addition, since we are studying the content of the traffic on our invoices closely, we can assume that the CLECs will be doing the same thing. Without the ability to track the excluded usage by CLEC, there will be no way to demonstrate what volumes we are talking about.

Itd like for CBS to develop an IT work request to provide the functionality discussed above. Please call me at 404-927-7560 so we can discuss this further.

Jim

Dated: 09/11/97 at 10:17

Contents: 2

Dated: 10/07/97 at 12:47 Contents: 2

MESSAGE

Subject: ISP Recommendation Sender: Pinky W. Reichert / AL, BRHM07 PHONE-1=205-977-1755;

Part 1

FROM: Pinky W. Reichert / AL, BRHM07 PHONE-1=205-977-1755;

TO: Gregg Beck / AL, BRHM02

PHONE-1=404-927-7596;

Elizabeth H. Carnes / AL, BRHM09

PHONE-1=404 927-7598;

ERIC CASTILLO / NOTES

DDT1=HPNOTES; DDV1=ERIC CASTILLO@BCI;

PHONE-1=(404) 529-7462;

Sheri C. Irvin / AL, BRHM06

PHONE-1=205 321-4410;

Part 2

Ladies and Gentlemen,

I've reviewed the ISP recommendations the team made and have shared them with Marc Cathey. Since I just sent him the E-Mail, if he has additional input, I'll send it at a later time.

Just wanted to share some comments that came out from our Billing Meeting with TCG on Friday morning, 10-3-97. They asked us what methodology we were using to extract the ISP usage. Barbara Bradley was on the call with us to hear the customer questions. BellSouth took an action item to ask Legal what we can and can't share with the customer about the process we used for gathering ISP usage. Teleport was very honest and said the usage sent to us didn't separate ISPs. They also expressed concern that noone had approached them to discuss the ISP issue before we paid only a portion of the bill. Teleport is going back to discuss the ISP usage within their internal organization. Teleport didn't ask the \$64,000 question about if our bills to them excluded that usage.

We have a face to face meeting on 10-14-97 and TCG has asked to discuss our process with them and mutually agree on what we should do going forward. At that time, we will need to share the details of what each bill included. I'm sure we will come up with some type of compromise adjustment and move forward. We plan to invite Lynn Smith's folks to the meeting also.

Based on the above, I'd like to reinforce the fact that we need to be sure our process of identifying this usage is on firm ground by. The assumptions we used must be validated.

I agree with Sheri and Beth that we need to get an exemption from Bill Guarantee for backbilling of the usage. Seems to me I remember a "Rule" for exemptions that allowed for a FCC or State mandate to be excluded. I don't have a clue how that process works today. In my former Staff Life, there was a committee that handled reviewing of exclusions and giving a yea or nay. Rick Klein used to chair the team and Debbie Marionneaux was a member. I'll check with Debbie and see if she can shed some light on the process.

Pinky

During derived to the part of part of part of part of part of the part of the

10/24/97 10:33 Susan H. Claytor /AL, BRHM07

MESSAGE

Subject: procedures

Sender: Larry E. Glover /AL, BRHM06

7 10:33

Page:

Dated: 10/24/97 at 9:49

develop Policy

Contents: -me get with Jim to Ensure he is including

· Item 1

FROM: Larry E. Glover /AL, BRHM06

TO: Susan H. Claytor /AL, BRHM07 { Undisplayable address parts } funded tem 2

Item 2

Susan

This process has some big holes but I can not offer an alternative at this time. Just because a number shows up on one of these directories does not mean that it is actually an ISP. Wayne has not documented any part of the verification process. I will talk to Bob Cunningham about documenting this area.

The Source IV section has the word "guarantee" and I am not sure we will ever get in a position to say the list is 100% accurate and complete. If that is the expectation we should set the record straight now. Do we need to draft a letter to legal on the accuracy of the process and the affect on any PSC/FCC testimony?

On your service order proposal - can we expect the customer to tell us how he plans to use the line? Some customers would tell us that it is none of our business.

Thanks.

Larry G.

Item 3

MESSAGE

Subject: procedures

Creator: Susan H. Claytor /AL, BRHM07

Item 3.1

TO: Larry E. Glover /AL, BRHM06 { Undisplayable address parts } David L. Hollett /AL, BRHM07

Item 3.2

Larry, Per our discussion today, attached is an Email I just received. My concern with these procedures is that it seems to recognize there are still gaps, it seems that it could change daily as the internet changes (how would you ever know what is on the Directory. Com vs other places), and it leaves that potentially big unknown in procedure IV.

I also have questions about a call to an 800 number. I would think the 800 number would be published, which may be ok for invoice verification (assuming

Dated: 10/23/97 at 13:26

Contents: 1

they are including originating 800 service on our data base), but our terminations for billing would need the associated POTS number. It also focuses totally on Internet providers but does not address other ESP like 976

To me the procedure needs to have rationale included which gets blessed by those who decided to pursue this process.

I would have a tough time if put on the witness stand to testify to the accuracy and completeness.

Any thoughts or concerns from you?

Item 3.3

Dated: 10/23/97 at 12:25 Contents: 3 **MESSAGE**

Subject: procedures

Creator: James H. Childress /AL, BRHM07

Item 3.3.1

TO: Susan H. Claytor /AL, BRHM07 { Undisplayable address parts }

Item 3.3.2

Susan,

Attached are the procedures that Wayne Fleming provided for determining ISP/ESP numbers. Your thoughts?

Jim

Item 3.3.3

Dated: 10/20/97 at 11:54 MESSAGE Contents: 3

Subject: procedures

Creator: Wayne N. Fleming /AL, BRHM03

Item 3.3.3.1

FROM: Wayne N. Fleming /AL, BRHM03 { Undisplayable address parts } TO: Bob J. Cunningham /AL, BPMM09 { Uncisplayable address parts }

CC: Barbara Z. Bradley /AL, BRHM07 { Undisplayable address parts } James H. Childress /AL, BRHM07

Item 3.3.3.2

see attachment for your copy.

Item 3.3.3.3

Dated: 10/23/97 at 13:13 Size: 999 bytes TEXT

Subject: procedures

Creator: Susan H. Claytor /AL, BRHM07

Per our discussion today, attached is an Email I just received. My concern with these procedures is that it seems to recognize there are still gaps, it seems that it could change daily as the internet changes (how would you ever know what is on the Directory. Com vs other places), and it leaves that potentially big unknown in procedure IV.

I also have questions about a call to an 800 number. I would think the 800 number would be published, which may be ok for invoice verification (assuming they are including originating 800 service on our data base), but our terminations for billing would need the associated POTS number. It also focuses totally on Internet providers but does not address other ESP like 976

To me the procedure needs to have rationale included which gets blessed by those who decided to pursue this process.

I would have a tough time if put on the witness stand to testify to the accuracy and completeness.

Any thoughts or concerns from you?

Page 1

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Please complete ALL the requested information and submit to the appropriate person/group per CBS

For Microsoft Word users: The form is password protected to prevent erasing the field titles. Select cancel on the password box and press OK on the error window. Select 'Normal' option under 'View' to make text larger on screen. To enter information on the form, click in the field where you see the 'make text larger on screen. To enter information on the form, click in the field where you see the 'field . To select box, click with mouse in box or use 'X' key. If you need to remove the protection to enter field . To select 'unprotect document' option under 'Tools', and enter the password of 'save'. See CRIS/CABS Work Request Job Aid for additional instructions.

See CRIS/CABS Work Reques	L SOD MIG	101 40411101141					
2. General Project Information							
22 Project (Product/Service)	Informatio	on (Requester)	·		Requester/Project	Reference Nu	ımber
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Abstract (Brief- 30 Character or Develop a process to withhold b	illing of 191	P/FSP Minutes	of Use traffic and	to d	isplay withheld MOUs	in the CLEC b	ills.
2b. Other Related Work Requ	est Cross	Reference #					
Application or Tool	231 0.000				Reference Number	r(s)	
Application of Tool							
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4a. Administrative Information	n (Reque	ster, Plan Spo	nsor)				
Date Submitted	Custom	er Desired Due	Date (CDDD)		equester Name		
11/5/97	7/5/98			Er	ric Castillo	Requester Ph	one Number
Requester Department			Requester RC			404-927-764	4
PCU			22032000 Project Lead D	enart	tment		Phone Number
Project Lead Name			InterConnection	repair Sen	vices	404-927-7598	
E. H. Carnes Business Plan ID							
Project Encore: Local Intercon	nection.						Si N sebaga
Plan Manager Name			Plan Manager I	Depa	rtment	Pian Manage 404-927-787	r Phone Number
Libby Gerald			PCU			404-321-101	<u> </u>
4b. Administrative Informati	on (CBS)		Billing Sponsor	Des	artment	Billing Spons	or Phone Number
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Sheri Irvin Other Contacts							
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RF-XXXX

CRIS/CABS Work Request

(11-96)

Page 2

5. Descrip	otion of Business Obje s generated the need for this	ctive (Re change/wo	quester) rk? Please check (X) th	ne approp	riate box.			
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П	Short/Long Te	rm Impact	If there are any specific short/long term in				
ш	Constraints/De		on this one, list and explain.				ere are any other Work Requests dependent
6e. Spe	ecial Consider	ations for Prioritiz	ation Rationale and Comments Provide o	details of all ite	ms che	cked	n 6d.
7. Pre	eliminary R	Requirements (Requested Process/System Cha	anges)	and abo		O-Ves N=No 2=Not Sure)
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and in Qual A.	n a more usable lity Analysis C Number each re	e format. hecklist Note: Plea equirement individua	ase refer to local checklists for impacted are lly.				
C. D.	Give an example Define any input	le or a test case (tell uts and triggers for the	ionable. Translate acronyms. us how to prove the product/service you are ne process.	requesting			
F	Provide all cons	straints and condition	he product or service. hs. ents (e.g. increased transaction volume) and	l customer sat	isfaction	crite	ria.

(11-96)

Page 4

7c D	reliminary Requirements (Detailed Statements/Information for Requested Process/System Changes)	
#	Description	Literation de la contenta
1.	Description Provide ability to 1) Identity ISP/ESP MOU traffic originated in a facility based CLEC, a customer terminated in BST's network; 2) Withhold billing CLEC for ISP/ESP MOU descustomer terminated in BST's network; 4) Develop report to substantiate ISP/ESP MOU traffic, but do not rate it; 4) Develop report to substantiate ISP/ESP MOI support bill inquiry cases.	and destined to an ISP/ESP stined traffic; 3) Display U on a per CLEC basis to
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	TE: To add another requirement, select 'unprotect document', enter the password 'save', click outside the right mar	gin of the previous section and press
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Glo	ossary (definitions/terms/acronyms):	
8.	Appropriate Approp	
8a. Sid	. Approval Signatures (Requester, Plan Manager, and COU Sponsor) challenges of Requester, Plan Manager, and COU Sponsor are required prior to submitting request to CRIS/CABS.	Date
	equester	Date
Pla	an Manager	Date
C	DU Sponsor	Date
85	o. Approval for Work or for T&C	
Ple	ease check (X) the appropriate boxes:	
F	This request is approved and covered by the Business Plan in 4a. This is to request a pap binding Time & Cost (T&C) estimate only.	
<u> </u>	This is to request a non-binding Time & Cost (T&C) estimate only.	

NOTE: Attach other documents electronically if possible.

Dated: 12/16/97 at 10:24 Contents: 3 MESSAGE

Subject: ISP call retention

Sender: Bob J. Cunningham /AL, BRHM09

Item 1

FROM: Bob J. Cunningham /AL,BRHM09 { Undisplayable address parts }
TO: Barbara K. Olsen /AL,BRHM07 { Undisplayable address parts }
CC: Barbara Z. Bradley /AL,BRHM07 { Undisplayable address parts }
Susan H. Claytor /AL,BRHM07
Sheri C. Irvin /AL,BRHM06 { Undisplayable address parts }

Item 2

Barbara,

Attached is a work request to permanently retain detailed CLEC dialed, ISP terminated calls for audit purposed and/or possibility of rebilling these messages at some time in the future.

Any question please give me a call at 205 321-1400

Thanks, Bob Cunningham

Item 3

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Page 1

ISPRETN DOC.

1 Instructions	
	·

Please complete ALL the requested information and submit to the appropriate person/group per CBS procedures For Microsoft Word users: The form is password protected to prevent erasing the field titles. Select cancel on the password box and press OK on the error window. Select 'Normal' option under 'View' to make text larger on screen. To enter information on the form, click in the field where you see the 'field. To select box, click with mouse in box or use 'X' key. If you need to remove the protection to enter more you see the new . To select box, eller with mouse in box of use of the password of 'save'. See CRIS/CABS Work Request Job Aid for information, select 'unprotect document' option under 'Tools', and enter the password of 'save'.

itional instructions.						
General Project Inform	nation					
Project (Product/Service)	Information (Requester)		Requester/Project	Reference Nur	nber	
piect Name ISP RECORD	KETEMTION					
bstract (Brief- 30 Characte	r or less) Description of	Request				
erminent retention of ISP C	3112					
2b. Other Related Work Request Cross Reference #		Reference Number	Reference Number(s)			
Application or Tool			9712	122 601 - T		
thecked due to CRIS Bill in	S QUANT	UM	ms. Note: If CRIS bill (page is being c	hanged, CABS box should also be	
For IT Business Anal	vst/Project Manage	r Use Only	·		Descript Date	
PATS/Control Number	Revision Nu	ımber	Revision Date		Received Date	
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			Information Tech	nnology System	n Manager (CABS only)	
information Technology Pro	oject Manager (CABS on	.41				
Requester & CES A Administrative Information Date Submitted	(Requester, Billing Prog Customer Desired D	am Director/Sport	Requester Name Bob Cunningham			
12-16-1997	12-31-1997	Requester RC		Requester Pt 205 321-14	none Number	
Requester Department Customer Billing Services		25021100		205 321-14	oject Lead Phone Number	
CBS/COU Project Lead Na	me	CBS/COU Project Lead Dept Customer Billing Services		205 321-1400		
Bob Cunningham		Customer Billi	ig Services			
Cost Object/Initiative Maintain permanent CLEC	dialed ISP calls for futu	re audit and/or reb	oilling requirements		Descriptions of Phone Number	
Billing Program Director/St	ponsor	Billing Prog Director/Sponsor Dept		Billing Program Director/Sponsor Phone Number 404 335-0873		
Barbara Olsen Other Contacts						
Other Contacts						
Information Technology C	ontact(s)					
:						

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Page 2

ISPRETN

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ISPRETN .DOC

6a. Low: Process Improvement

NOTE: High expense reduction > = \$400,000 or > = 5 FTE's

Medium expense reduction < \$400,000 and > = \$200,000 or < 5 FTE's and > = 2 FTE's

Low expense reduction < \$200,000 or < 2 FTE's

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Prioritization Rat	ionale and Comment						
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Date Sensit	vity						
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Short/Long	16111 Import						
Constraints	/Dependencies	If there are any other constraints that m dependent on this one, list and explain.	ignt affect	301160	, <u></u>	,	•
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Special Consid	erations for Prioritiza	tion Rationale and Comments Provide det					
efinate retentio	n of complete CLEC	Dialed ISP terminated calls.					
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CRIS/CABS Work Request

(5-97)

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ISPRETN .DOC

	reliminary Requirements (Detailed Statements/Information for Requested Process/System Changes)	
1.	Description: Create a file to indefinately retain calls originated by a C termination number is identified as ISP (from file MS05.XFA1010.ISF	LEC where the PT)
	Test Cases: Inputs Triggers: Outputs & Effects:	
	Constraints & Error Conditions: Performance Impacts:	
2.	Description: Test Cases: Inputs Triggers: Outputs & Effects: Constraints & Error Conditions: Performance Impacts:	
3.	Description: Test Cases: Inputs Triggers: Outputs & Effects: Constraints & Error Conditions: Performance Impacts:	
4.	Test Cases: Inputs Triggers: Outputs & Effects: Constraints & Error Conditions: Performance Impacts:	the right margin of the previous
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-	Approvals Approval Signatures (Requester and Billing Program Director/Sponsor) Inatures of both Requester and Billing Program Director/Sponsor are required prior to submitting request	to CRIS/CABS.
Re	quester Bob Cunningham	Date 12-16-1997
	ing Program Director/Sponsor Barbara Olsen	Date 12-16-1997
8b Ple	. Approval for Work or for T&C ase check (X) the appropriate boxes:	ahawa in 4s
_ <u>x</u>	This request is approved and covered by the Cost Object/Initiative This is to request a non-binding Time & Cost (T&C) estimate only	e Shown in 4d.

CRIS/CABS Work Request

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ISPITETN .DOC

NOTE: Attach other documents electronically if possible.

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? QUANTUM

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at offering.

? CRIS

X CABS

3. For IT Business Analyst/Project Manager Use Only

Bob J. Cunningham /AL, BRHM09 Page 1 12/16/97 16:17 Dated: 12/16/97 at 16:09 MESSAGE Contents: 3 Subject: 800 dialed ISP calls Creator: Bob J. Cunningham /AL, BRHM09 FROM: Bob J. Cunningham /AL, BRHM09 { Undisplayable address parts }
TO: Barbara K. Olsen /AL, BRHM07 { Undisplayable address parts }
CC: Barbara Z. Bradley /AL, BRHM07 { Undisplayable address parts } Susan H. Claytor /AL, BRHM07 Sheri C. Irvin /AL, BRHM06 { Undisplayable address parts } Item 2 Barbara, Attached is a work request to remove 1+800 dialed calls that terminate to an ISP number from being excluded from access billing. Any questions please call me at 205 321-1400

Thanks, Bob Cunningham

RF-XXXX

CRIS/CABS Work Request

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Page 1

800ISP .DOC

a deneral regions in	rmation				
2a. Project (Product/Service		tion (Requeste	r)	Doguestas/Projec	ct Reference Number
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Abstract (Brief- 30 Charac drop 800 ISP dialed calls f	ter or less) rom ISP loc	Description of okup	Request		
2b. Other Related Work Re	equest Cro	ss Reference #		Reference Numl	narie)
Application or Tool					701-T
				11121	101-1
checked due to CRIS Bill in CAI	n CABS Fo BS	rmat offering. QUANT	UM	ems. Note: If CRIS bill	page is being changed, CABS box should also be
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Requester & CBS/	diministr n (Request	er, Billing Progr	ram Director/Spon	sor) Requester Name	
Date Submitted 12-16-1997	Custo	mer Desired Do -1997	ue Date (CDDD)	Bob Cunningham	
Date Submitted 12-16-1997 Requester Department	Custo 12-31		Requester RC	h ·	Requester Phone Number
Date Submitted 12-16-1997 Requester Department Customer Billing Services	12-31		Requester RC 25021100	Bob Cunningham	205 321-1400 CBS/COU Project Lead Phone Number
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CRIS/CABS Work Request

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CRIS/CABS Work Request

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CRIS/CABS Work Request

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Page 4

800ISF
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6c. Pri	ioritizat	ion Rat	ionale and Comme	nts for Mandated and High					
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7a lr	nnacted	Denar	tments/Areas Che	ck (X) appropriate column for area(s) af	fected by th	e propo	sed c	ha	ange. (Y=Yes, N=No, ?=Not Sure)
Y	N	?			Y	N	?	٦	
П	\Box	П	Tariff				T	ī	On-line Systems
$\overline{\sqcap}$	The state of	ī	USOC/FID/B	CS			TC		Reports/Files/MP Studies
$\overline{\sqcap}$	一	ī	Service Orde	er/CSR			T		Conversions
\Box	Tim	ī	Rating				TC		Input Format
$\overline{\sqcap}$	In	ī	Journals		X		ΤĊ		System Interfaces
П	In		Taxing				\Box		Manual Workarounds
$\overline{\Box}$	In	In	Settlements						User Documentation
$\overline{\Box}$	In	ī	Enhanced Bi	lling Services]	User Training
П	而	ĬΠ	Bill Format/E	Bill Media/Bill Presentation	Ī		T		Network Changes
$\overline{\sqcap}$	Th	П	Usage to be	Dropped/Zero-rated			T		Other*:
$\overline{\sqcap}$	In	Ī	Adjustments	/Treatment			T		
Γī	171		Approved by	Bill Continuity Team (If Yes,	attach Bil	Moc	kup	р	prior to submitting work
	1	1		unding approvai)					
* N	IOTE:	See	Job Aid for s	uggestions of OTHER items t	o include				
7b. l	Prelimin	ary Red	quirements Instruct	ions (Details of Requested Process/Syst	em Changes)			
				ach area checked YES (Y) above. Please	e follow the	instruct	ions l	be	low, so that the requirements will be
			l in a more usable hecklist Note: Ple	ase refer to local checklists for impacted	d area to insi	re billir	ng int	eg	rity.
A.	Number	r each i	requirement individ	ually.	.		•	Ī	
B. C	Define a	any teri	ms that may be quale or a test case (estionable. Translate acronyms. ell us how to prove the product/service	VOU 310 100	estina			
			uts and triggers fo		you are requ	resung			
			puts and effects for straints and condit	or the product or service.					000037
				nons. ments (e.g. increased transaction volum	e) and custo	mer sa	tisfac	tio	
		mpac	is to service agree	ments tolg, mereased transaction volum	e) and custo	mer sa	13146	.10	

RF-XXXX

CRIS/CABS Work Request

(5-97)

Page 5

800ISP .DOC 7c. Preliminary Requirements (Detailed Statements/Information for Requested Process/System Changes) # Description: Taking the 72D record, & using the CRIS Toll Guide file, identify if the terminating number was 1. originally dialed as 1+800, if yes do NOT pass call record to the ISP lookup file, but pass on to billing. **Test Cases:** Inputs Triggers: Outputs & Effects: Constraints & Error Conditions: Performance Impacts: 2. Description: Test Cases: Inputs Triggers: Outputs & Effects: Constraints & Error Conditions: Performance Impacts: 3. Description: Test Cases: Inputs Triggers: Outputs & Effects: Constraints & Error Conditions: Performance Impacts: 4. NOTE: To add another requirement, select 'unprotect document', enter the password 'save', click outside the right margin of the previous section and press enter. Glossary (definitions/terms/acronyms): 8. Approvals 8a. Approval Signatures (Requester and Billing Program Director/Sponsor) Signatures of both Requester and Billing Program Director/Sponsor are required prior to submitting request to CRIS/CARS. Requester Bob Cunningham Date 12-16-1997 Billing Program Director/Sponsor Barbara Olsen Date 12-16-1997 8b. Approval for Work or for T&C Please check (X) the appropriate boxes: This request is approved and covered by the Cost Object/Initiative shown in 4a. X This is to request a non-binding Time & Cost (T&C) estimate only.

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NOTE: Attach other documents electronically if possible.

Page 1

MESSAGE Dated: 12/17/97 at 6:11 Contents: 3

Subject: 97121701-T CRIS Request Creator: Barbara K. Olsen /AL, BRHM07

Item 1

TO: DISTRIBUTION (Title: 97121701-T CRIS Request)

Item 2

I concur in working this request for a time and cost estimate.

Barbara Olsen

Item 3

Preliminary Requirements

Business Opportunity

CBS supplies CABS with a list of telephone numbers that represent Internet Service Providers (ISPs). CABS uses this list to assign a 'TI' error to a all recordings that terminate to these numbers. The 'TI' error code keeps access and local interconnection charges from being billed to these recordings. However, some of these numbers represent terminating 800 numbers. Therefore, CABS needs to make modifications to not assign a 'TI' error to terminating 800 traffic.

Impact On CABS

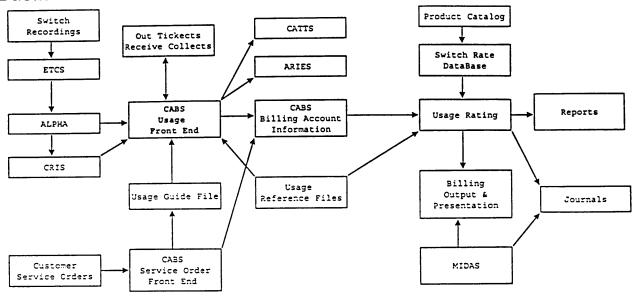
1. The CABS process that assigns 'TI' needs to be modified to keep from assigning 'TI' errors to terminating 800 traffic.

Detailed Requirements

1. Identification of Terminating 800 Traffic
In order to prevent 'TI' errors from being assigned to terminating 800 traffic CABS will have to change the
manner in which it processes the ISP number list it currently receives from CBS. When this file is being loaded
into CABS for processing each number should be checked against the CRIS Guide File. If the CRIS Guide File
list that number as a terminating 800 number, then CABS should not consider that number an ISP number.
This will prevent all traffic terminating to that number from being assigned a 'TI' error.

000040

Business Model



User Acceptance Testing

Identification of User's Involvement in Testing

CBS will have to supply a list of ISP numbers that represent both terminating 800 traffic and non-terminating 800 traffic.

Test Scenarios and Test Verification Media

The following is a list of test scenarios for each requirement and the media need to verify the test results:

800 ISP Traffic

Terminating usage to a 800 ISP number should not have a 'TI' error assign and therefore should have either Access or Local Interconnection changes applied.

Non-800 ISP Traffic

Terminating usage to a non-800 ISP number should have a 'TI' error assign and therefore should not have either Access or Local Interconnection changes applied.

000042

Private/Proprietary: No disclosure outside BellSouth except by written agreement
Save Date: 01/26/98 5:53 PM Page 3

Operational Requirements/Dependenci	es
-------------------------------------	----

Reference File Updates

External System Changes

Effective Date Dependency

Preconditioning/Cleanup

User Trigger Event

Design Constraints/Considerations

000043

=========	=======================================		
	REQUIREMENTS AP	PROVALS	
CBS Rep:		Date:	_
	Bob Cunningham		
Proj. Mgr:		Date:	_
, , , <u></u>	, CABS-IT		
Sys. Mgr:		Date:	_
<u> </u>	, CABS-IT		
· Tester:		Date:	
100001.	, CABS-IT		

Date: March 5, 1998

To: Allan Price

Bill Stacy

Copy to: Bill McNair

Scott Schaefer Jim Childress Leo Shoemaker Fred Hamff

From: Dave Hollett

Subject: North Carolina and Florida Orders Concerning ISP

We understand that the North Carolina commission issued an order related to ISP calls between BellSouth and US LEC, and the Florida commission issued a similar order for WorldCom. To my knowledge, CBS has not been notified formally of the NC ruling, though billing is impacted by the order. We did receive a copy of the FL ruling.

We need to know who will be responsible for coordinating implementation of these orders. We are currently facing serious resource constraints in the CABS billing area of IT, so any necessary billing changes will need to be submitted soon to even be a candidate for Release 98.3, currently scheduled for implementation in 4th quarter, 1998. We also have a pending request for bill format changes related to ISP. That work request is based on the assumption that ISP is not billable. If the ISP billing policy is likely to be changing because of the North Carolina and Florida orders, we should probably defer this current bill format request to allow other critical billing work to be sone instead.

Attached are concerns and questions specific to the billing of ISF that we believe need to be addressed by someone in ICS and/or Regulatory.

Please let me know as soon as possible how you assess the impact of these rulings on billing for local interconnection. If you have questions, please call me at 205-321-3736.

ISP Issues to be Addressed

- Do the rulings apply to all CLECs or only to US LEC in North Carolina and WorldCom in Florida?
- 2. We quit billing for calls terminated to an ISP, but we held that usage. Should that held usage be billed? If so, would billing guarantee apply, and should the usage be billed or should a debit adjustment be made to the bill?
- 3. Does the pending billing change request submitted by the local interconnection project team need to be suspended? This request, to detail the non-billed ISP usage on the bill, is currently targeted for CABS Release 98.2, which has serious resource jeopardies.
- 4. Does a new request to begin billing ISP usage in North Carolina and Florida need to be submitted? If so, what is the priority in light of the resource contention in CABS?
- 5. Will BellSouth change the policy regarding billing for ISP on a state by state basis, or is it likely we will change the policy for all states at the same time?

Cabs 98.2

Work Request #: 97111410

CLEC Internet Service Provider - Phase II

SECTION 1 -- OVERVIEW

Description

BellSouth currently has a policy of not billing calls terminating to Internet Service Providers (ISPs). CABS and BBI supports this policy by assigning the ARIES Error Code 'TI' to these calls to prevent their billing. The TI errors are not subsequently reentered for processing. The implementation of the procedures necessary to identify and assign the 'TI' Error Code was considered Phase I of the CLEC ISP Project.

Phase II will involve the implementation of procedures that will discontinue the setting of the 'TI' Error Code and instead display at zero rate, the CLEC ISP volumes on the CABS bill. This change in processing is being done in order to track CLEC ISP volumes for the CLEC as well as for BellSouth. The overall BellSouth policy of not billing for these calls however, remains intact.

Process Summary The process for identifying CLEC Terminating ISP traffic will remain the same. Once the traffic is identified however, the 'TI' Error Code will not be assigned. Instead, the traffic will be guided, rated (at zero rate), and billed as any other Feature Group D Terminating (FGD) usage would be. Exhibit I is the Business Model for this project.

Additional References

ATTACHMENT TABLE	PAGE
I-BUSINESS MODEL	4
II-STAT PAGE	5
III-BILL PAGE	6
IV-RATE ELEMENT PRODUCT UPDATE FORM	7
V-MP-4027	8

SECTION 2 -- BBI OPERATIONS IMPACT

CLEC Internet Service Provider - Phase II

Affected Work Groups

The table below lists all work groups in BBI and whether the group is impacted. For the work groups with an impact (indicated by a YES) a reference to the page for information is noted.

BBI WORK GROUP	IMPACT YES/NO	PAGE#
ACCOUNTS DATABASE		
BILL MAILING		
BILLING CONTROL/VERIFICATION	YES	3
BILLING INTERFACE GATEWAY (BIG)		
PRODUCT CATALOG	YES	3
BRU/EBRU/CEVU		
CLUB/EBS		
DATA ENTRY		
JOURNALS		
ARIES	YES	3
MISCELLANEOUS REVENUE		
PAYMENT REMITTANCE OFFICE		
RATE DATABASE/RATE FILE		
SETTLEMENTS		
SERVICE ORDER/HOLD FILE		
CATTS	YES	2
USAGE	YES	2
RATING	YES	2

Usage

CABS Usage Front End will continue to check Terminating FGD traffic against a list of ISP numbers supplied by BBI. When Terminating FGD matches the ISP list, the following steps will be taken:

- CABS Traffic Type '10' will be assigned.
- Jurisdiction '0' (Interstate) will be assigned.

Rating

Usage with a CABS Traffic Type of '10' will be assigned a BDT Stat Element value of '78'.

Usage with a Stat Element value of '78' will not have any usage factors applied. This includes PIU, PLU, NCTA, and T/O factors.

Usage with a Stat Element value of '78' will be zero rated. It will be assigned a Bill Category of '4' (Miscellaneous), and a Bill Element value of '34' (Terminating ISP).

CATTS

Usage with the ISP CABS Traffic Type ('10') will be assigned a CATTS Traffic Group of '17'.

Product Catalog

The Product Catalog will have to be updated with the billing information necessary to display ISP usage on the bill. The rate for the usage will be zero. Exhibit IV is the

Issue Date: 9/8/98 Revision Date: Page 2

Cabs 98.2

Work Request #: 97111410

CLEC Internet Service Provider - Phase II

Usage Rate Element Product Update Form for ISP Traffic.

ARIES

With the implementation of this project, TI Errors will no longer be produced. There are no plans at this time to release or delete the previously created TI Errors.

Billing Control/ Verification The Stat Page of the printed bill will be modified to display the correct verbiage for a BDT Record Type of 103527 (Statistics Record), and a BDT Stat Element value of '78' (Terminating ISP). Exhibit II is an example of the Stat Page Modifications.

The Bill Page of the printed bill will be modified to display the correct verbiage for a BDT Record Type of 103520 (Miscellaneous Bill Record), and a Miscellaneous Element of 'K3' (Terminating ISP). Exhibit III is a example of the Bill Page Modifications.

The MP-4027 will be modified to display the ISP Traffic Type. Exhibit V is an example of the MP-4027 modifications.

SECTION 3 -- IMPLEMENTATION SCHEDULE

Implementation Schedule

CLEC Internet Service Provider - Phase II will be implemented in CABS Release 98.2.

	Sites	Implementation Date
Pilot	GA, TN	10/2/98
Final	AL,FL,LA,KY,NC,SC,MS	10/9/98

SECTION 4 -- SUPPORT CONTACTS

BBI Contacts

BBI contacts are provided in the table below.

Contact Information	Primary Contact	Secondary Contact
Name	Harold L. Alexander	Brenda Wood
Address	25D3 BST City Center	25D3 BST City Center
Phone #	205-321-3203	205-321-4407
Beeper#	205-619-3548	205-619-3615
Manager Group	CABS-LOB	CABS-LOB

IT Contact

The IT contact for this implementation is listed below.

Name	Phone #
Dan Furlong	205-988-6980

NOTE: IT should only be contacted if immediate assistance is needed, the problem is system specific, and the BBI contacts cannot be reached. EXHIBIT I-BUSINESS MODEL

Cabs 98.2

Work Request #: 97111410

CLEC Internet Service Provider - Phase II

CLEC Internet Service P						
		xhibit II ge Modifications				
	SIAI Pa	ge Widdiffications				
			BILL NO INVOICE BILL DA ACNA DI	NO TE	404 S01-0117 S010117117-98 JAN 01, 1998 PAGE 144	
* * * * *	* INTERSTATE STATS FO DEC 01 97	R OFFICE ATLNGA THRU DEC 31 97	BU84C CIC	10233 *	* * * * *	
GA - EC 5192						
TERMINATING	RECORDED MOU	MESSAGES	T/O	FACT	TORED MOU	
TANDEM -RESIDENT ISPÆSP	136	97		•••	136	
TOTAL TERM	136	97			136	

Work Request #: 97111410

CLEC Internet Service Provider - Phase II

Exhibit III	
BILL Page Modifications	

BILL NO INVOICE NO BILL DATE ACNA DLT 404 S01-0117 117 S010117117-98001 JAN 01, 1998 PAGE 145

* * * INTERSTATE USAGE FOR OFFICE ATLNGABU84C CIC 10233 * * * * * * DEC 01 97 THRU DEC 31 97

RATE CATEGORY	QUANTITY	RATE	AMOUNT
MISCELLANEOUS - GA - EC 5192 TERMINATING ESP/ISP TOTAL MISCELLANEOUS CHARGES TOTAL INTERSTATE USG CHGS FOR OFF			0.00 0.00 0.00
**************************************	ATLNGABU84C CIC	10233	25.58

Exhibit IV

RATE ELEMENT PRODUCT UPDATE FORM

Field Name	Size	Value
Bill Category Value	5	4
Bill Category Description	45	Miscellaneous
Bill Element Value	5	34
Bill Element Description	45	Terminating ISP
Orig/Term Indicator (Direction)	1	2
Facility/Term Indicator (Transport Type)	11	0
Tandem/Direct Indicator (Route)	1	0
Rate Category Value	5	4
Rate Category Description	45	Miscellaneous
Rate Element Value	5	29
Rate Element Default Description	45	Terminating ISP
Interstate Account Code-Premium	3	JEO
Interstate Account Code-Non Premium	3	JEO
Intrastate Account Code-Premium	3	GEO
Intrastate Account Code-Non Premium	3	GEO
Local Account Code-Premium	3	CNB
Local Account Code-Non Premium	3	CNB
Bill Element to BDT Translate (BC/BE/OT)	1/2/1	4/34/2
BDT Element ID	2	K3
BDT Record Type	6	103520
BDT Description	45	Terminating ISP
PPS Indicator	1	0
PPS Indicator Description	45	
PPS Tracking Indicator	1	Н
PPS Tracking Indicator Description	45	
PPS Index	2	20
PPS Index Description	45	

CLEC Internet Service Provider - Phase II

CLEC Internet Service Provider		Exh	ibit V				
		MP	-4027				
FSD MV10-3.8 DATE 08/21/98 TIME 19:14	С		ING ANALYS ERIFICATION				MP-4027 RETAIN 6 MO TENNESSEE
PEPORT MONTH · IIII.			JL 19 BILLP				PAGE 382
ACCOUNT: 901S190017	ACNA: THB	FG: D	END OFFI	CE: ARTNT	NMTRS5	CIC: 6444 TSC:	NA
JURISDICTION: INTERSTATE ORIG/TERM/OTH: TERMINATING ROUTING: TANDEM PORTED IND: RESIDENT							
USAGE TRAFFIC TYPE DATE	MOU	M	SGS	FROM DATE	THRU DATE	ACCESS NUMBER	LTL
980709 ISP/ESP MMPHINCTDS0	5,000	0.0	1	980701	980718	901867	
**** BELL INTER TOTAL FROM 07.01/98 TO 07/18/9	3: 5,000		1				
**** TT TOTAL NON-J	5,000		1				
980619 NON 800	0	35.8	8	980619	980630	901867	
MMPHTNCTDS0	1	45	8	980619	980630	901867	
980622 NON 800 MMPHTNCTDS0	1	43	0	320013	980030	901807	
980623 NON 800	1	16.1	2	980619	980630	901867	
MMPHTNCTDS0 980624 NON 800	0	17.9	4	980619	980630	901867	
980624 NON 800 MMPHTNCTDS0	O	17.9	7	330013	330030	701007	
980701 NON 800	0	25.0	4	980701	930718	901867	
MMPHTNCTDS0 980706 NON 800	0	35.3	4	980701	930718	901867	
MMPHTNCTDS0	U	33.3	-	950701	930/10	901807	
980707 NON 800	0	14.0	3	930701	980718	901867	MMPHTNCTDS
980709 NON 800	5,000	0.0	1	980701	980718	901867	
MMPHTNCTDS0							
**** BELL INTER TOTAL FROM 06/30/98 TO 06/30/98	3: 2		22				
**** BELL INTER TOTAL FROM 07/01/98 TO 07/18/9	5,001		12				
**** TT TOTAL NON-J	5,003		34				
**** TOTAL END OFFICE NON-J FOR CIC 6444	10,003		35				

CLEC ISP - Phase II DCP 97111410

	on D	MS05.PFA'9 08.UTT1 Errot File t Stat Pre	Bill (277,		Bill ; 4027	BDT P cord	Bill BDT Records MAVPIC	Reper MP.2.11	Header Record (100101)
	A DANCKT TDSRVC PP ORDER	·							MU70A15 MP3061
	Expected Results	illing account enerated.	Usage displayed on the customer bilt All factors should apply	Usage displayed on the Stat Page Usage displayed on the Bill Page Usage should be assigned Traffic Type 10 Usage should be interstate juris fiction Usage should be zero rated No Factors are applied (PUU): CTA, T/O, etc)	The Stat Page should be produced even though there is a Bill Page with zero revenue.	BDT Record 1 ypes 103520 = DH Record and 10350.] - Stat Record with the following values: Stat Element = 78 Jurisdiction =: Interstate No Factors applied No Rate (zero) Bill as Miscellancous Charge (Misc El K3) Rate Catagory = 0.1 Rate Element : 34	BDT Record Type of 103527, Stat Record, with a BDT Stat Element of 78 Stat Page with the verbage per the requirements	MAVRIC Reports and CABS Usage Rating MIU24A10	Printed and Transmitted bills are not suppressed
DCP 97111410	File/Inputs							•	
	Prerequisités	Terminating FGD usage to an Interr	Terminating FGD Usage (Non ISP terminated) Account should have factors being applied to terminating usage.	Terminating FGD ISP Usage Account should have factors being applied to terminating usage.	Terminating FGD ISP Usage should be the only type usage on this account	Terminating FGD ISP Usage.	Terminating FGD ISP Usage Account should have factors being applied to terminating usage.	Terminating FGD ISP Usage	ISP Usage on account Script US004 Account with ISP usage only
	Description of the party of the	Verify that calls terminating to an Internet Service Provider no longer generate a	Verify that terminating usage is properly displayed on the customer account	Verify that terminating ISP usage is properly displayed on the customer account	Verify that terminating ISP usage is properly displayed on the customer account	Verify the BDT Records created from the Terminating ISP Usage	Verify Stat Page of the Bill displays the correct verbage for ISP Terminating usage.	Verify that CABS Usage Rating and MAVRIC handle the ISP Usage the same	Verify that the Bill Suppress Indicator on the Bill Header Record is set to off for bills that have 10 35 20 records with mise element of 'K3'
		US001	US002	US003	US004	10001	B1002	B1002	№ 0057

CLEC ISP - Phase II DCP 97111410

		4027 C. Port	-		
DAN/CKT DISRVC, ORDER					
File/Inputs (Daylord Results (Daylord)	Volume of traffic type 10 = volume of CATTS Traffic Group 17	4027 Report with the wording per the	design document		
File/Inputs					
Prerequisifes	System test must be expanded to include ARIES (MS11A80, 83)	1001	Terminating FGD Usage to an ISP		
Description C. Fry C. F. F.	कृतिकृतिकृतिकृतिकृतिकृतिकृतिकृतिकृतिकृति	Group 17		formatted with the new ISP	usage
Serpilly	ON001		RP001		

000058

Single Work Request

Work Request #: 97111410

Short Description: WITHOLD BILLING OF ISP/ESP MINUTES

Scoping Priority: 0

Work Request Status: Complete

Cost Object: ENC-CABS

Responsible Group:

Date Received: 2/12/98

Reference #:

Effective Date:

CDDD: 7/5/98

Target Release: CABS.98.2

Entered By: Castillo, Eric

Target Date: 07/10/98

Cust. Priority:

Commit Date: 10/9/98

Date Entered: 11/14/97

Mandated: N

Database Impacting: N

Requirements Approval Date:

Requester: Castillo, Eric

Item Coordinator: Alexander, Harold CBS Manager: Alexander, Harold Planning SME: FURLONG, DANIEL B Business Analyst: MEYER, RENEE BEALE

Design Baseline Date: Complete Date: 10/9/98 Closeout Date: 12/31/98

STF Tester: BROWN, PHILIP W

Design Coordinator: Zimmer, Suzanne

Last Update Date: 1/12/99

Billing Program Director:,

Business Plan Manager: ,

OLA:

Requesting Business Unit:

Revenue Generated: 0

Expense Reduction: 0

EWP: UNAUTH

Business Summary: BST, IN ACCORDANCE WITH FCC DIRECTION, HAS DECIDED TO WITHHOLD BILLING MINUTES OF USE TRAFFIC ORIGNATED IN A FACILITY BASED COMPETITIVE LOCAL EXCHANGE COMPANY (CLEC) AND TERMINATING IN AN ISP/ESP PROVIDER CONNECTED TO THE BST NETWORK. AS A RESULT OF THIS

Risk Probability:

Risk Impact:

Risk Description:Bst, in accordance with FCC direction, has decided to withhold billing minutes of use traffic orignated in a facility based Competitive Local Exchange Company (CLEC) and terminating in an ISP/ESP provider connected to the BST network.

Mitigation Plan:

Status Notes: 12 28 98 Entered closeout date and changed EWP to unauthorized. J Morgan (733-5332)

Business Function: Withhold Billing of ISP/ESP

Business Assumptions:

Business Solution(s)

System Solution(s)

Production Verification Plan:

File Location(s)

Physical Location:

Customer Satisfaction Rating: 5

Requester Cost Rating: 5

Requester Satisfaction Rating: 5

Satisfaction Comments:

Summary Estimate Information

Satisfaction Form Sent: 1/6/99

Requester Timely Rating: 4

Requester Quality Rating: 4

Estimation Status: No Estimate Needed

Estimation Sent: N

	BS Plan	IT	CPU	DASD	Due Sent	Non Rinding Hours Estimate
	Hours	Hours	Hours	MGB	Date Date	Non Binding Hours Estimate
Planning Estimates	_	0	0	0		Sent Date:
Analysis Estimates	0	0	0	0		Actual IT Hours: 633
Design Estimates	0	0	0	0		
Design Estimates						

Associations CCR(s) Issue(s) Requirement(s) 36056 8049 11164 Signatures for Requirements Requirements have been reviewed, confirmed as complete by the requestor, and approved for implementationas documented: Date Title/Department Name

PRIVATE/PROPRIETARY: Not for use or disclosure outside BellSouth except by written consent.

REQUIREMENTS DOCUMENT 97071713 - Identify CLEC to ISP Calls

Conceptual Requirements

Business Opportunity

BellSouth's position is not to bill Local Interconnection charges for calls originating from the CLEC and terminating to an Internet Service Provider (ISP) number that's a BellSouth customer.

Impact On CABS

- 1. CBS needs to supply a list of ISP numbers to CABS
- 2. CABS needs to check the Called Party on all terminating records against the ISP number list and assign an error code if there is a match.

REQUIREMENTS DOCUMENT 97071713 - Identify CLEC to ISP Calls

DETAILED REQUIREMENTS

INPUT FORMAT DESCRIPTIONS

CBS will have to supply a list of ISP numbers to CABS. A list will be maintained on a PC application by A. ISP Number List CBS. When this list is updated by either additions or deletions CBS will send an updated file to the nine CABS processing sites. This updated list will overlay the file that was being used by CABS. This option will remove CABS from the process of updating ISP numbers.

The format of the ISP file to be used by CABS would be the same regardless of which option is used. The following is the layout of the ISP file.

•		
Field Name ISP Number Effective Date	<u>Length</u> 10 bytes 8 bytes	Description NPA and seven digit ISP number The date of when the number was added to the ISP File. This will be the date that CABS starts assigning an error to calls made to this number. This field will
Termination Date	8 bytes	be in CCYYMMDD format, i.e. 19970723. The date that CABS is to no longer assign an error code to calls made to this number. This field will be in CCYYMMDD format, i.e. 19970723. If this field is not populated, then the number is considered active.

The format of the file will be an eighty byte fixed record in a fixed block format. This file will also have to be sorted in ascending order by ISP Number.

DETAILED BUSINESS RULES

A. Identification of ISP Calls

All terminating access records with a Call Code 066 or 119 will have to perform the following functions;

- 1. Check to see if the call terminates to a BellSouth end office. If it does, then proceed to step 2, else
- 2 An attempt should be made to match the Called Party Number to a number on the ISP File. If a match is resume normal processing. found, then proceed to step 3, else resume normal processing.
- 3 If the date of the usage is prior to the Effective Date or after the Termination Date on the ISP File, then the usage should be processed as normal. If this is not the case, then proceed to step 4.
- 4 Assign a TI error to the usage recording. The TI error code will uniquely identify calls from a CLEC that terminated to an ISP that is a BellSouth customer.

The only calls that CABS receives with an ISP number in the Called Party Number should be for local calls made from a CLEC end user. Calls made from a BellSouth end user would be processed through CRIS. An end user would not call an ISP using a long distance or toll number.

REQUIREMENTS DOCUMENT 97071713 - Identify CLEC to ISP Calls

IDENTIFICATION of USER'S INVOLVEMENT in TESTING

OPERATIONAL REQUIREMNTS/DEPENDENCIES

OUTPUT FORMAT DESCRIPTIONS

BUSINESS MODEL

OPERATIONAL REQUIREMENTS/DEPENDENCIES

DESIGN CONSTRAINTS/CONSIDERATIONS

REQUIREMENTS DOCUMENT 97071713 - Identify CLEC to ISP Calls

=======================================	=======================================	
	REQUIREMENTS APPROVALS	
Requester:	Rob Cunningham	Date: 8/11/97
Project Team Member:	Bradley Serbara Bradley	Date: 8/11/97
Project Manager:	Suzanne Zimmer	Date:
System Manager:	Dan Furlong, CABS-IT	Date:

Post-it [®] Fax Note	7571	Dala 8-1,2-9	cages /
	ZIMMER	Erom C	C.JWWINGHAM
Co/Dept.		Co.	
Pnone #		Phone #	
Fax # 988-65	70	Fax #	

444-060 FAR FLEMING ('H) PROJECT: BARBARA BRADLEY / BOB_CUNNINGHAM Data workhouse - 2 months of Data only & only for Sa. at Present. need a Sponson CLUneed a Sponson CLU-6-24-97 called Karen 5 leftweys fleming Consumer Services - Marketing word word with colonnades - 52 D2

called her 6-24-97 for her group as sponsor for our Request: Karen Berryman 205-977-158 Consumer Services - Marketing call pro. if Proce one munth data. Want: Data; BST to Wireless one month data.

Wireless to BST.

Looking for % traffic split & Possible Bill Value De Sort Wireless originating & NPA NNX XXXX level. - Compare to 20-57 3 Sout BST to Wireless A) Sout By NPA NNX.

get Sub total of # cells & mou

Continue of



17 / Til

if given a list of 15P# for La. Sort on these #5 dished from a CLEC originated #. (cf 119)

Genie Believe Karen may have a camed Query on 15P ?? Vout. 59 men - 3 n more Home in any give day.

1-120 Lidas 1482 Semi Harefor Pager 889-0674

term to CLEC.

1) ST 12 O All BST Local/INTERL.

3) " IXC

1) TELESS

5) OLEC TO OLEC

Bota whentwee Ba only (2 mo) Pull off Wireless calls
BST to wireless

Wineless to BST

for 1/0 70/30 Pull

Original Serted By WPA NNX XXXX

Sub total BST - (torn) NPA NNX Sat 7 (2) then_) -> B5T to Wnelesso git snowthly total 3) -> call Wayne fleming can eve get

150 # in Ba

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000069

CLEC Warehouse

Octoring to 15P. # collo & MOU

By CLEC account.

To ole C

need Broken drum By. BST to Clec oob

Provide

3 1xc to Clec 119 Probably

Clec to Clec 119 Combined

Winelso to Clec 006 & 066.

Lallo to Clec /15P - 006.066.119

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Bel	Sou	th
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TermNPAN	Minutes of Use	CallType	Origind	# of Me	essages
	162	6		0	40
	0	5		0	2
	5	66		1	6
	370	6		0	125
	107	5		0	33
	0	6		0	1
	0	330		0	1
	0	6		0	1
	0	330		0	2
	3222	1		0	893
	19	66		5	11
	6267	1		0	952
	0	330		0	5
	1	66		5	2
	499	192		0	294
	15260	6		0	1294
	0	330		0	647
	228	41		0	124
	0	68		0	1
	487	132		0	163
	2582686	1		0	222564
	32	192		1	16
	4889	65		1	266
	831	1		3	21
	62	192		5	61
	0	6		5	1
	19903	65		5	11081
	195	1		5	63
	626	66		7	139
	82	65		9	19
	218372	1		0	8519
	0	330		0	10
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	2 5	6		0	5 9
		66		5	
	256032	1		0	47832
	106	192		0	30
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127	1	. 0	48
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0	132	0	4
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232	1	5	2
26065	6	Ō	1252
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2752038	1	0	147929
4746	66	1	184
4	192	1	2 1609
3174	66 6	5 5	1
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0	330	0	1
27	6	0	13
0	330	0	1
0	66	5	1
29	6	0	4
102	66	7	8
29	6 330	0	23 5
0	330	0	1
344	6	0	65
0	330	0	1
0	6	0	1
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35	66	7	3
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1162785	1	ō	40273
18751	6	0	291
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100076	1	0	53462
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355 1264	66	5	926
14	1	· 5	10
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122	132	0	28
467784	1	0	57328
207	192	0	93
1104	6	0	536
50 239	41 68	0 1	25 128
16	6	5	7
8403	65	5	4154
73	1	5	45
49	192	5	36
34	66	7	16
17	132	0	17
116	192	0	44
7595	6	0	309
53 0	41	0	35
641195	330 1	0 0	250 83065
35	66	1	21
1	1	3	3
5330	66	5	3208
35	1	5	36
6	192	5	6
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4	66	9	1
53	192	0	31
100317	1	0	36223
108	6	0	87
23	132	0	12
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4391	66	5	2612
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14860	6	- 0	1
0	41	0	
7149	66	1	109
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2917	1	0	869
450	132	0	219
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790	41	0	153
0	330	0	159
33665	6	0	1556
7444677	1	0	372703
48	72	0	43
2126	66	1	307
0	192	1	1
7185	1	5	365
3	6	5	2
56	192	5	38
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86	41	0	58
73	192	0	5
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155	6	0	73
150162	1	0	21101
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26	192	0	29
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65	1	5	38
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14145	66		9504
203	66	7	139
43573	1	0	3236
3	192	0	1
0	330	0	31
70	6	0	15
35	65	5	25
4	6	0	5
1978	1	0	799
0	330	0	5
67	68	5	33
26285	6	0	1333
3	41	0	1
6714602			
	1	0	241190
19022	66	1	536
1301	1	3	34
7681	1	5	254
180	66	5	134
1	6	5	2
910996			
	1	0	33499
15303	8	0	653
4607	65	1	139

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0	66	5	1
124787	1	0	34139
0	330	0	82
30	41	0	25
290	6	0	71
2	192	٥	3
1	132	0	3
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21	66	1	9
17	1	5	8
2523	66	5	1790
102	66	7	32
8	65	8	3
4	6	0	2
5629	1	0	1241
1	192	0	1
0	192	5	1 100
128	68	5 0	20
0	330	0	6
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34 114412	1	0	2885
114412	66	5	5
59	1	0	64
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57	1	Ō	44
1	66	7	2
126	1	0	62
0	330	0	3
0	41	0	2
1379	1	0	906
34	6	0	4
260	65	5	112
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31	5	0	4
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381	1	0	167
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585	1	0	327
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1118	66	5	714
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1827	1	0	418
2	1	5	1
13	66	5	6
511	1	0	95
243	1	0	151
374	1	0	147
33128	1	. 0	5792
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6	6	0	8
29805	1	0	9645
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2	1	5	1
284	66	5	171
40	1	0	163
0	330	0	1
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1023	6	0	146
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437	66	7	142
12	66	7	1
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Jeanne;

this letter is to request the use of the UDW (usage data warehouse) in handling dispute between BST & MCI- METRO's service in Georgia. Interconnect would be ne source of funding for this study, however time and charges will be required to assure funding. Please provide study cost to me as soon as possible so that we can then pass cost information to Interconnect for approval.

Listed are the details required in this study.

List of MCI NPA/NXX codes:

ent known ISP NPA/NXX scope

Data to be used: month of September 1997

- 1) Require: All BST identified originating local calls (001) terminating to numbers above -total number of calls & total MOU against each NPA/NXX
- 2) require: All BST identified originating local calls (001) terminating to numbers above, where the number terminated to was identified as ISP. Total number of calls & total MOU against each NPA/NXX

questions, please call me at 321-1400

Thanks;
Bob Cunningham

RICH TEXT

Subject: UDW valuation

Dated: 10/27/97 at 11:50

Size: 1349 bytes

Creator: Bob J. Cunningham /AL, BRHM09

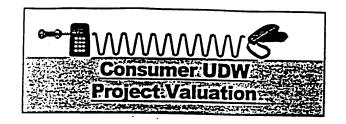
Karen, attached is the response on the UDW CLEC billing verfication.

I do not have anything to respond on the wireless, since the revenue volume was very low compared to the CLEC's, thus we did not followup

with the wireless data.

Thank you for your assistance in allowing us (CBS) to use the UDW. It proved to be a great value to us.

Bob Cunningham



June 23, 1999

To:

Bob Cunningham -

From: Karen Berryman

3535 Colonnade Parkway Birmingham, Alabama

35243

Location: South Colonnade, S2D1

Phone: (205) 977-1582 / Fax: (205) 977-1213

CC:

Bob Yingling, Joey Schultz, Steve Brown

Date:

June 23, 1999

Project Information

CBS001b



CLEC Billing Validation (CFMS)

The completion of this questionnaire is the final step in the UDW project life cycle. Consumer's goal is to identify the value being provided by the usage data. This information will be used to plan Consumer's future participation in the Usage Data Warehouse.

As the requester, you are the only one who knows the full extent of the benefits that this usage data has provided to your business unit. By filling out the questionnaire you will help ensure that we will be able to continue to meet your needs.

Please answer the questions below and return the questionnaire to me by e-mail, Fax, or inter-office mail before 10/31/97. If you have any questions, please don't hesitate to contact me.

1.	Would you	like	assistance t	o complete	this a	uestionna	aire?

No X Yes (If Yes, please call Karen Berryman to schedule an appointment.)

2. How were the project results of benefit to your organization?

Incremental Revenue: a)

"The additional revenue generated by incorporating usage data into the project." Example: If your last promotion using list data had a 10% take rate and the current promotion that used Usage Data had a 15% take rate, the incremental revenue associated with your project would be based on that 5%.

i) Please Describe the benefit.

_Additional revenue was not generated - see (B)

ii) Please indicate the dollar value associated with the benefit:

Circle the level of confidence you have in the Dollar Value. iii)

1 2 3 8 10 5 Lowest Highest

iv) Please describe the way in which the value was determined:

ь)		t Avoidance; penses that are avoided or reduced through the application of this data."
	Exan	nples include reduced contractor expenses and the cost of outside data.
	i)	Please Describe the benefit.
		existing company revenue dollars were saved in that the data from the UDW
		proved that reciprocal billing by the CLEC was greatly inflated, thus we owed them
		substantially less.
	ii)	Please indicate the dollar value associated with the benefit:
	,	EG: (1) customer billed BST \$80,468.62 (1) month bill, should have been billed
		\$ 7,584.31 based on UDW data
	iii)	Circle the level of confidence you have in the Dollar Value.
	,	1 2 3 4 5 6 7 (8) 9 10
		Lowest Highest
	iv)	Please describe the way in which the value was determined:
	•••	Using ISP (internet service provider) numbers determined by the UDW that belong to
		the CLEC, these calls were removed from reciprocal billing, thus the reduction of
		revenues due to the CLEC from BST.
	_	
c)	_	petitive Positioning: Retention;
		revenue or value associated with retaining individual customers in the current
		etitive marketplace"
		nay include supporting BellSouth's strategic initiatives.
	i)	Please Describe the benefit.
		the CLEC may determine that transferring ISP service from BST ownership to
		CLEC ownership is no longer profitable, thus BST will retain customers. This is
		based on ISP terminating traffic no longer being paid to the CLEC as reciprocal
		compensation.
	ii)	Please indicate the dollar value associated with the benefit:
		_Unknown
	iii)	Circle the level of confidence you have in the Dollar Value.
		1 2 3 4 5 6 7 8 9 10
		Lowest Highest
	iv)	Please describe the way in which the value was determined:
*1	0 11	
d)		tative Benefit (Learning);
		fits that do not have a direct revenue associated with them, but provide new learnings
		our customers and/or products."
	i)	Please Describe the benefit.
	ii)	Please indicate any dollar value you would have paid to an outside vendor for this
	•••	information:
		· · · · · · · · · · · · · · · · · · ·

	e)	Any C	ther Benefits;
	ŕ	i)	Please Describe the benefit.
		ii)	Please indicate the dollar value associated with the benefit:
		iii)	Circle the level of confidence you have in the Dollar Value. 1 2 3 4 5 6 7 8 9 10
		iv)	Lowest Highest Please describe the way in which the value was determined:
3.		hat you h	ave gone through the entire life cycle of the project, what would you change to increase results?
4.			resent your results to others within BellSouth for internal marketing purposes?
	а) Y i)	es _X_ No Please describe any considerations or limitations
5.	V	Vhat geog	raphic area would you like to see the UDW expanded into next?
6.	V a) M	roject need to be re-run? Yes No Ionthly _X _ Quarterly Yearly Other (Please describe below) Monthly if data was available for all sites
7.	C	_!	? Suggestions? Data from the UWD was presented in any level of detail desired, and in a timely shion.
		_	

000083

RICH TEXT Dated: 8/12/97 at 14:48 Size: 1014 bytes

Subject: data warehouse info Creator: Bob J. Cunningham /AL, BPHM09

Jeanne: Attached is the information you requested, not as brief as you may have liked, infact a bit (windy) - but what the heck.

I included this mail to others as information, and food for thought.

Bob Cunningham

CLEC & CMRS (Cellular) Reciprocal Billing Issues

CLEC- Competitive Local Exchange Company
CMRS- Commercial Mobile Radio Service (Cellular service)

The recent FCC Order on Local Competition for both CLEC and CMRS providers now permits the carriers to bill BST for the usage traffic that BST terminates to them.

The invoice billing that BST has received thus far indicates that the revenue impact to the company is in the 10's of millions of dollars and is growing each month. Of major concern is that BST has no method to date in validating usage charges that are presented to BST from the CLEC & CMRS providers.

Another major concern that has been identified is that the CLEC providers are signing up ISP (Internet Service Providers) to use their facilities (NPA-NNX scope of numbers). If the ISP provider is a BST account, there is no negative revenue impact to BST regardless of how large the call usage grows on terminated calls. However, if the ISP transfers to a CLEC, BST has lost an account & now will be compensating the CLEC for all the ISP terminated traffic.

The Company's position is that NO mutual compensation should be billed to either party for any calls terminating to ISP numbers.

On 6-25-1997 Karen Barryman (Customer Services)
Wayne Fleming (Customer Operations)
Jeanne Harem (I.T.)
Bob Cunningham (CBS)

met to discuss using the Data Warehouse as a means to validate usage data that the CLEC & CMRS providers were sending us. It was agreed that Jeanne Harem would program the Data Warehouse with information we requested, even though data as of today is restricted to only the state of Georgia. Usage data for May 1997 was used and provided us with some startling results:

We used the only CLEC account on hand that had usage for Georgia: Wireless CMRS data is forthcoming, we have three or more accounts to check.

See next page for results for data output.



Page 2

CLEC account name under study is MFS; (Georgia only)

Usage for May 1997 charged to BST was 9,249,267 MOU (minutes of use)
Usage rate is; .0087, thus 9,249,267 X .0087 = \$80,468.62 due to MFS based on invoice.

Data warehouse reflected BST terminating traffic to the CLEC NPA-NNX codes that this customer owns was: 13,012,667 MOU.

Of the above usage 12,240,907 MOU was identified as terminating to ISP numbers associated with this account.

Thus 13,012,667 (Total BST terminated usage including ISP terminated usage)
- 12,240,907 (Total ISP usage)
871,760 (Total BST terminating usage only)

871,760 X .0087 = \$ 7,584.31 due the CLEC if ISP usage is not included in reciprocal billing.

Using the Data Warehouse gave us the ability to identify and separate usage types terminating to the CLEC, which then can be used to validate and aid in disputing usage charges. The Warehouse data can be screened in any number of methods, giving the end used a very large and powerful tool.

Another plus for the Data Warehouse is that changes can be made as needed, the system is not locked into release dates and other constraints.

Supporting information can be obtained from;

Bob Cunningham (CBS) 205 321-1400

TOTAL # OF CALLS	141,471	512	14	3,457	6	2	92	135	14	140,767	22	28	649	4	16	178,973	762	33	3,708	10	96	129	395,274	319	53	3,063	39	845	63,511	121	9	2,387	46	45
TOTAL MOU	547,076	1,739	21	6,247	8	0	279	0	13	144,952	22	100	904	7	0	934,402	12,149	138	7,176	13	175	0	2,234,336	8,239	112	4,606	126	0	146,100	252	2	3,545	84	0
ORIG INDCO	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
CALL TYPE	1	9	41	99	68	72	192	330	-	-	9	41	99	192	330	-	9	41	99	89	192	330	1	9	41	99	192	330	1	9	41	99	192	330
TO NPANXX											,				,							1	•	•		•			•				τt	10



000087

0 17,302 0 201 0 2611 0 201 0 287,650 0 287,650 0 141 0 0 287,650 0 1,578 0 0 1,378,620 0 0 4,579 0 0 4,579 0 0 4,579 0 0 22,399 0 0 387,312 0 0 61,998	-	0	9,181,454	1,258,400
0 127 0 12,128 0 0 0 0 0 0 0 0 0	9	0		1,135
0 12,128 0 2,611 0 201 0 287,650 0 277 0 147 0 0 147 0 0 121,929 0 0 121,929 0 0 442 0 0 147 0 0 442 0 0 442 0 0 1,378,620 0 0 46 0 0 387,312 0 0 63 0 0 0 63 0 0 0 63 0 0 0 63 0 0 0 0 63 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	41	0	127	71
0 2,611 0 201 0 287,650 0 277 0 1441 0 121,929 0 0 131 0 0 1,378,620 0 0 442 0 0 442 0 0 442 0 0 442 0 0 387,312 0 0 387,312 0 0 63 0 0 17,967 0 0 61,098	99	0	2	7,775
0 287,650 0 287,650 0 141 0 141 0 147 0 0 109 0 121,929 0 0 131 0 0 442 0 0 0 0 442 0 0 442 0 0 0 0 0 31 0 0 4579 0 0 387,312 0 0 0 0 0 0 0 0 0 0 0 0 0 0	72	0	2,611	1,035
0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	192	0	201	132
0 287,650 0 141 0 1,658 0 0 121,929 0 0 121,929 0 0 131 0 0 442 0 0 442 0 0 442 0 0 0 0 0 31 0 0 4,579 0 0 22,399 0 0 387,312 0 0 63 0 0 61,998	330	0	0	159
0 121 0 0 121 0 0 1,378 0 0 22 0 0 24 0 0 387 0 0 0 17 0 0 0 0 0	1	0	287,650	108,563
0 121 0 0 121 0 0 1,378 0 0 1,378 0	9	0	277	136
0 121 0 0 121 0 0 1,378 0 0 1,378 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	41	0	141	95
0 121 0 0 121 0 0 1,378 0 0 22 0 0 24 0 0 387 0 0 17 0 0 0 17	99	0	1,658	1,259
0 121 0 0 121 0 0 1,378 0 0 22 0 0 387 0 0 17 0 0 0 17	192	0	147	61
0 121 0 0 0 0 0 1,378 0 0 4 0 0 22 0 0 22 0 0 0 17 0 0 0 17 0 0 0 0 0	330	0	0	70
0 0 1,378 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	1	0	21,	41,477
0 1,378 0 0 1,378 0 0 4 0 0 22 0 0 387 0 0 17 0 0 0 17	9	0	109	51
0 1,378 0 0 4 0 0 4 0 0 22 0 0 387 0 0 0 17 0 0 0 0 0	41	0		-
0 1,378 0 0 4 0 0 4 0 0 22 0 0 387 0 0 17 0 0 0 17 0 0 0 61	99	0	442	269
0 1,378 0 0 4 0 0 4 0 0 22 0 0 387 0 0 17 0 0 0 17 0 0 0 61	192	0	31	18
0 1,378 0 0 4 0 0 4 0 0 22 0 0 387 0 0 17 0 0 0 17	330	0	0	65
0 4 0 22 0 22 0 387 0 0 17 0 0 0	1	0	,37	107,704
0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	9	0	1,537	460
0 22 0 0 22 0 387 0 0 17 0 0 17 0 0 61	41	0	46	19
0 22 0 387 0 0 17 0 0 17 0 0 61	99 -	0	4,579	1,902
0 0 0 0 0 17 0 0 0 0 0 0 0	72	0	7	1,043
0 0 387 0 0 17 0 0 0 0	192	0	39	. 11
0 387 0 0 17 0 0 0 0	330	0	0	1 1
0 0 0 17 0 0 0 0 0	1	0	-	141,991
0 0 0 0 0 0 0 0 0	9	0	747	209
0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	41	0	63	34
0 0 0	99		2	999'5
0 0 61	68		0	
0 0	192		16	20
0 61	330		0	
-	1	0	61	18,3
0	9	0	188	22



-	134		24	_	73,674	62	15	1,343	11	6	64	10,048	27	Υ-	200	4	2	16,354	2	20	31	7,202	167		85	3	5	85	100,791	94	23	419	29	1,885
0	257	0	0	0	326,656	103	25	1,855	4	19	0	24,446	135	0	336	11	0	63,702	-	17	0	57,672	394	10	165	7	0	107	301,556	199	40	552	75	5,898
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
41	99	192	330			9	41	99	72	192	330	-	9	41	99	192	330	1	9	99	330	-	9	41	99	192	330	-	1	9	41	99	192	1



107,723 42,582	7		0 33	2,702,632 132,713	249 107	18 13	3,455 2,020	58 26	0 63	218 98	0	4,849 2,430	12 5	51 59		1,174	0	0 3
330 0 107	0 9	0 99	330 0	1 0 2,702	0 9	41 0	0 99	192 0	330 0	1 0	0 99	, 0	41 0	. 0 99	1	1 0	0 9	0 99



1.258.400	1,135	71	7,775	1,035	132	159	108,563	136	95	1,259	61	70	41,477	51		269	18	65	107,704	460	19	1,902	1,043	. 11	14	141,991	209	34	5,668		20	7	18,399	22
9.181.454	17,302	127	12,128	2,611	201	0	287,650	277	141	1,658	147	0	121,929	109	-	442	31	0	1,378,620	1,537	46	4,579	22,399	39	0	387,312	747	63	17,967	0	16	0	61,098	188
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
-	9	41	99	72	192	330		9	41	99	192	330	1	9	41	99	192	330	1	9	41	99 -	72	192	330	1	9	41	99	89	192	330	-	9



1	134		24		73,674	62	15	1,343	11	6	64	10,048	27	1	200	4	2	16,354	2	20	31	7,202	167	3	85	3	5	85	100,791	94	23	419	0
0	257	0	0	0	326,656	103	25	1,855	4	19	0	24,446	135	0	336	11	0	63,702	-	17	0	57,672	394	10	165	7	0	107	301,556	199	40	552	75
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
41	99	192	330	1	-	9	41	99	72	192	330	1	9	41	99	192	330	1	9	99	330	- 1	9	41	99	192	330	1	1	9	41	99	192

3	0	0	99
	0	0	9
401	1,174	0	1
565	134	0	-
56	. 51	0	66
9	12	0	41
2,430	4,849	0	1
	0	0	66
86	218	0	1
63	0	0	330
26	58	0	192
2.	3,455	0	99
13	18	0	41
107	249	0	9
132,713	2,702,632	0	-
33	0	0	330
42	19	0	99
12	7	0	9
42,582	107,723	0	-
2	0	0	330

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 7 Page 1 of 2

REQUEST:

Since January 1, 1995, has BellSouth made any effort to meter traffic to ESPs served by BellSouth originating from MCI WorldCom end users or otherwise segregate such traffic from other traffic?

- a. Describe all efforts by BellSouth to meter such traffic or otherwise segregate such traffic from other traffic, including, but not limited to, a description and the date of each step BellSouth took from January 1, 1995 to the present to identify minutes of use terminating to BellSouth customers that are ESPs.
- b. In particular, describe in detail the method used for this purpose in effect at the time of executing the Agreement.
- c. Identify all persons who participated in these efforts and all documents which evidence this activity by BellSouth.

RESPONSE:

a. BellSouth has made considerable efforts to identify minutes of use to BellSouth ISP customers in order to ensure that it did not bill any CLEC reciprocal compensation for ISP traffic. Beginning in October 1995, BellSouth implemented a process in CABS by which the usage record for every call originating from CLECs' NPA-NXXs to BellSouth end users was sent to an error file to be held. This process was intended to ensure that CLECs were not billed any reciprocal compensation, including for ISP traffic. In some rare instances, BellSouth did not properly load every CLEC NPA-NXXs into CABS, in which case usage for calls originating from an NPA/NXX that had not been properly loaded may have been invoiced by BellSouth.

In January 1997 BellSouth began a formal process to separate ISP traffic from local traffic by identifying specific 10-digit telephone numbers of ISP providers served by BellSouth. This process was intended to ensure that calls originating from any CLEC

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 7 Page 2 of 2

RESPONSE: (Cont.)

(regardless of the originating NPA-NXX) to numbers of an ISP served by BellSouth were sent to an error file to be held. In June 1997 BellSouth instituted a work request to implement this enhancement to CABS. Although originally targeted for completion by August 1st, the enhancement was not implemented in CABS until September 1997.

In September 1998, CABS was again revised to specifically detail the ISP traffic on the interstate portion of the bills sent by BellSouth to show the CLECs the ISP minutes of use for which they had not been billed.

- b. See BellSouth's response to MCI WorldCom's 1st Interrogatories, Item No. 7 (a).
- c. Although there were a number of people who participated in these efforts, the following individuals were directly involved:

Sheri Irvin – Coordinated the implementation of the changes made to CABS in 1995 and 1996.

Laura Walls – Coordinated the implementation of the changes made to CABS in 1996.

Bob Cunningham - Provided operations support for CABS changes made in 1995 through 1998.

Sandi Cockrell – Provided operations support for CABS changes made in 1995 through 1998.

Clyde Greene – Provided operations support for CABS changes made in 1995 through 1998.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 8 Page 1 of 1

REQUEST:

If your answer to Interrogatory No. 7 is that BellSouth had or has mechanisms or processes in place to meter or segregate ESP traffic, what tests, if any, have you conducted to determine the accuracy of this mechanisms or processes? Please answer this interrogatory with respect to each and every mechanism or process implemented for this purpose, and particularly for the mechanisms or processes in effect at the time of executing the Agreement.

RESPONSE:

For each change to CABS listed in the response to MCI WorldCom's 1st Interrogatories, Item No. 7, BellSouth performed the system test functions required for any update to the CABS software as defined by the software change processes used by BellSouth. These tests were performed to ensure that the system changes were developed and implemented successfully.

Additionally, in June 1997 a study (termed the "Georgia Data Warehouse Study") was performed which served as a prototype to the process ultimately used to determine ISP MOUs to be disputed from invoices sent by CLECs to BellSouth.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 9 Page 1 of 1

REQUEST: Since January 1, 1995, has BellSouth made any effort to meter traffic to ESPs served by MCI WorldCom, originating from BellSouth end users or otherwise segregate such traffic from other traffic?

- a. Describe all efforts by BellSouth to meter such traffic or otherwise segregate such traffic from other traffic, including, but not limited to, a description and the date of each step BellSouth took from January 1, 1995 to the present to identify minutes of use terminating to MCI WorldCom or other CLEC customers that are ESPs.
- b. In particular, describe in detail the method used for this purpose in effect at the time of executing the Agreement.
- c. Identify all persons who participated in these efforts and all documents which evidence this activity by BellSouth.

RESPONSE: a. Starting in January of 1998 to the present BellSouth utilized the ISP MOU Estimation Process.

- b. See BellSouth's response to MCI WorldCom's 1st Interrogatories, Item No. 9(a).
- c. The individuals involved in these efforts were: Ron Moreira, Richard McIntire and Bob Cunningham. For documents responsive to this request, see BellSouth's response to MCI WorldCom's 1st Request for Production, Item No. 8.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 10 Page 1 of 1

REQUEST:

Identify Project Encore. Identify when Project Encore was formed or created; identify the goals, purpose and objectives of Project Encore. Identify all persons who were members of Project Encore or who participated in any meetings or discussions conducted by Project Encore. Identify all actions, meetings, discussions and/or communications involving Project Encore which related, referred or pertained to the issue of the payment or non-payment of reciprocal compensation for traffic bound for ESPs and identify all documents reflecting, referring, relating to or pertain to any such discussions.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome to the extent it requests the identity of every person who ever participated in a meeting or discussion conducted by Project Encore, a description of every discussion or communication involving Project Encore concerning the issue of ISP-bound traffic, and the identification of every document referring, relating to or pertaining to any such discussion. BellSouth also objects on the grounds that such information is not relevant to any issue in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Project Encore is a group created by BellSouth to ensure BellSouth's compliance with §251. Project Encore was created in 1997, and representatives of various departments within BellSouth serve as members.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 11 Page 1 of 1

REQUEST: Describe the "Georgia Data Warehouse Study."

a. What were the principal conclusions of the "Georgia Data Warehouse Study?"

RESPONSE: The Georgia Data Warehouse Study was an analysis of usage data to determine if a process could be created which estimates the amount of ISP usage included in invoices received from CLECs. The conclusion was that there could be and, in fact, one was created.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 12 Page 1 of 2

REQUEST: With regard to the document captioned "CLEC Policy – Unintended Consequences," dated 11/14/97, attached hereto as Exhibit A:

- a. Identify the person(s) who prepared the document and their jobrelated responsibilities;
- b. Identify the person(s) who directed that the document be prepared and their job-related responsibilities;
- c. Identify the person(s) who received a copy of the document, or any document mentioning or concerning the document and their jobrelated responsibilities;
- d. Identify the facts or occurrences that which led to the preparation of the document;
- e. Identify the purpose for preparing the document; and
- f. Identify any other documents which mention or concern the document.
- g. Identify any and all actions taken and documents created as a result of the document.

RESPONSE: a.

- a. Andrew Watts, Area Manager Network Operations
- b. Preparation of this memo was initiated by Andrew Watts, Area Manager Network Operations
- c. George Jung, Manager Network Planning and Support
- d. Learning of the imbalance in trunks between CLECs and BellSouth.
- e. To advise headquarters staff of the trunking imbalance.
- f. BellSouth is not aware of any related documents.
- g. BellSouth is not aware of any related documents or actions taken.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 13 Page 1 of 1

REQUEST:

Identify all persons who participated in the decision to send the August 12, 1997 Ernest Bush memo to CLECs regarding the billing and payment of reciprocal compensation for ESP traffic; identify all discussions, meetings and communications which led to that decision, all persons who participated in drafting, reviewing or editing that memo and all documents which reflect, refer or relate thereto.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome to the extent it seeks information concerning every "discussion, meeting, or communication" concerning the August 12, 1997 Ernest Bush memo and the identity of every person who participated in such discussions and every document "which reflect, refer, or relate thereto." BellSouth also objects on the grounds that such information is not relevant to any issue in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving the foregoing objections, BellSouth states that a team of senior managers, executives and attorneys known as Project Harmonize made the decision to send the Ernest Bush letter. Members of Project Harmonize have included:

Jim Anderson	AVP - Finance
Hank Anthony	Senior Attorney
Greg Berthelot	AVP - Strategic Management
Denny Betz	AVP – Public Relations
Ernest Bush	AVP - Fed. Regulatory Policy & Planning
Bob Daniel	AVP – Product Commercialization
John Ebbert	AVP – State Reg. & External Affairs
Wayne Hay	Network VP – Operations Support
Alex Moraitis	VP – Customer Relations
Allan Price	AVP - Regulatory Planning
Eric Small	AVP – Interconnection Services
Bill Stacy	Operations VP – Interconnection Services

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 99-00662
MCI WorldCom's 1st Request for Production
April 14, 2000
Item No. 13 **ATTACHMENT**

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BELLSOUTH

BellSouth Telecommunications, Inc. Room 4471

Room 4425 875 West Peachtree Street, N.E. Atlanta, Georgia 30375 404 927-7190 Fax 404 420-8291 Internet Ernest L. Bush Obridge beliesuth.com

Ernest L Bosh
Assistant Vice President —
Regulatory Policy & Planning

SN91081223

August 12, 1997

To:

All Competitive Local Exchange Carriers

Subject:

Enhanced Service Providers (ESPs) Traffic

The purpose of this letter is to call to your attention that our interconnection agreement applies only to local traffic. Although enhanced service providers (ESPs) have been exempted from paying interstate access charges, the traffic to and from ESPs remains jurisdictionally interstate. As a result, BellSouth will neither pay, nor bill, local interconnection charges for traffic terminated to an ESP. Every reasonable effort will be made to insure that ESP traffic does not appear on our bills and such traffic should now appear on your bills to us. We will work with you on a going forward basis to improve the accuracy of our reciprocal billing processes. The ESP category includes a variety of service providers such as information service providers (ISPs) and internet service providers, among others.

On December 24, 1996, the Federal Communications Commission (FCC) released a Motice of Proposed Rule Making (MFRM) on interstate access charge reform and a Motice of Inquiry (NOI) on the treatment of interstate information service providers and the Internet, Docket Nos. 96-262 and 96-263. Among other matters, the MFRM and NOI addressed the information service provider's exemption from paying access charges and the usage of the public switched network by information service providers and internet access providers.

Traffic originated by and terminated to information service providers and internet access providers enjoys a unique status, especially call termination. Information service providers and internet access providers have historically been subject to an access charge exception by the FCC which permits the use of basic local exchange telecommunications services as a substitute for switched access service. The FCC will address this exemption in the above-captioned proceedings. Until any such reform affecting information service providers and internet access providers is accomplished, traffic originated to and terminated by information service providers and internet access providers is exempt from access charges. This fact, however, does not make this interstate traffic "local", or subject it to reciprocal compensation agreements.

Please contact your Account Manager or Marc Cathey (205-977-3311) should you wish to discuss this issue further. For a name or address change to the distribution of this letter, contact Ethylya Pugh at 205-977-1124.

Sincerely,

EZ. Bush

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 14 Page 1 of 1

REQUEST:

To the extent that the group, committee, entity or project known as Project Harmonize ever discussed the subject of reciprocal compensation for ESP traffic, state the dates of all such discussions, the persons who participated in all such discussions, the substance of all such discussions, the results of all such discussions and identify all documents that reflect, refer or relate to all such discussions.

RESPONSE: BellSouth objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome to the extent it asks BellSouth to identify with specificity: (a) all "discussions" that may have been had by any individual member or participant of Harmonize on the issue of ISP-bound traffic; and (2) all documents that may reflect, refer or relate to such discussions. BellSouth also objects on the grounds that such information is not relevant to any issue in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Because attorneys are involved in the Harmonize effort, BellSouth objects to this Interrogatory to the extent it seeks information protected by the attorney-client privileged or the work product doctrine. Subject to and without waiving the foregoing objections, for a list of Project Harmonize Team members, see BellSouth's Response to MCI WorldCom's 1st Interrogatories, Item No. 13. For documents reflecting discussions held by Project Harmonize concerning reciprocal compensation for ESP traffic, see BellSouth's Response to MCI WorldCom's 1st Request for Production, Item No. 4.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 15 Page 1 of 2

REQUEST:

State the number of minutes of use, as recorded by BellSouth, for which MCI WorldCom has terminated traffic from BellSouth customers in Tennessee to ESPs served by MCI WorldCom in Tennessee pursuant to each interconnection agreement between BellSouth and MCI WorldCom, from the date of the agreement to the present time.

RESPONSE:

Calls originating from BellSouth customers to ESPs served by MCI WorldCom are not terminated by MCI WorldCom. However, in an attempt to be responsive, the number of minutes for calls originated by customers of BellSouth bound for ESPs served by MCI WorldCom from January 1998 through March 2000 is as follows: 287,897,413.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 16 Page 1 of 1

REQUEST:

State the number of minutes of use, as recorded by BellSouth, for which MCI WorldCom has terminated traffic from BellSouth customers in Tennessee to MCI WorldCom customers other than ESPs in Tennessee pursuant to each Interconnection agreement between BellSouth and MCI WorldCom from the date of the agreement to the present time.

RESPONSE: The number of minutes of use for calls by BellSouth customers terminating to MCI WorldCom customers other than ESPs from January 1998 to March 2000 is 156,964,737 minutes.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 17 Page 1 of 1

REQUEST:

State the number of minutes of use, as recorded by BellSouth, for which BellSouth has terminated traffic from MCI WorldCom customers in Tennessee to ESPs served by BellSouth in Tennessee pursuant to each interconnection agreement between BellSouth and MCI WorldCom from the date of the agreement to the present time.

RESPONSE: Calls Originating from MCI WorldCom customers to ESPs served by BellSouth are not terminated by BellSouth. However, in an attempt to be responsive, the number of minutes for calls recorded by BellSouth originating from MCI WorldCom customers bound for ESPs served by BellSouth from October, 1998 through January 31, 2000 was 5,078,547 minutes.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 18 Page 1 of 1

REQUEST:

State the number of minutes of use, as recorded by BellSouth, for which BellSouth has terminated traffic from MCI WorldCom customers in Tennessee to BellSouth customers other than ESPs in Tennessee pursuant to each Interconnection Agreements between BellSouth and MCI WorldCom, from the date of the agreement to the present time.

RESPONSE: The number of minutes of use for calls by MCI WorldCom customers terminating to BellSouth customers other than ESPs is 40,940,548 minutes.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 19 Page 1 of 1

REQUEST:

For each month from January 1, 1997, through and including the present, did BellSouth exclude from its reciprocal compensation invoices to MCI WorldCom minutes of use for calls terminated to BellSouth customers that are ESPs. If BellSouth did exclude such traffic, answer the following for each invoice which excluded such minutes of use:

- Identify the invoice which excluded such minutes of use; a.
- Identify the month or time period of the minutes of use excluded; b. and
- Identify the total number of minutes of use excluded. c.
- Identify the way in which excluded minutes of use have been or d. are identified on the invoices.

RESPONSE: Calls originating from MCI WorldCom's customers to ESPs served by BellSouth are not terminated by BellSouth. However, in an attempt to be responsive, BellSouth provides the following reply.

> ESP minutes were excluded from invoices provided by BellSouth. The attached documents detail the invoice numbers and the amounts excluded. In general, each invoice includes usage which was recorded within the calendar month prior to the invoice date. On each invoice, the ESP minutes are labeled on a separate line on the bill per central office and can be found in the Inter-State portion of the bill. These minutes were identified using the process described in Interrogatory 7 which was implemented in September, 1997. This data is not available prior to October 1998.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 20 Page 1 of 1

REQUEST:

Identify any and all applicable tariff or contractual provisions that BellSouth considers pertinent to the payment of compensation for calls placed by BellSouth customers terminated by MCI WorldCom to an ESP on MCI WorldCom's network, including any provisions related to interest and penalties.

RESPONSE:

First, BellSouth does not agree that ISP-bound calls are terminated by MCI WorldCom to an ESP on MCI WorldCom's network. Second, BellSouth and MCI WorldCom did not mutually agree to pay reciprocal compensation for ESP-bound traffic under the interconnection agreement entered into between BellSouth and MCI WorldCom. Relevant tariff and contractual provisions are as follows:

Tariffs - Section 3, BellSouth's F.C.C. No. 1 Tariff

Interconnection Agreement:
Attachment I, Section 7
Attachment IV, Section 2

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 21 Page 1 of 2

REQUEST: Does BellSouth believe that ESP traffic is subject to reciprocal compensation?

- a. What is the basis for this belief?
- b. If BellSouth believes ESP traffic is not subject to reciprocal compensation, how is the cost of transporting and terminating traffic to ESPs to be recovered?
- c. What is the basis for the answer to subpart b?

RESPONSE: BellSouth is responding to this question as it pertains to Internet Service Providers (ISPs) that are a subset of ESPs since ISP-bound traffic is the issue in this case.

No. ESP/ISP traffic is not subject to reciprocal compensation. Reciprocal compensation obligations under Section 251(b)(5) f the 1996 Act apply only to local traffic. ISP-bound traffic is clearly access service and is jurisdictionally interstate.

a. CC Docket No. 78-72, 1983 Third Report and Order; CC Docket No. 89-79, 1989 NPRM; Order on Remand, Deployment of Wireline Services Offering Advanced Telecommunications Capability, FCC 99-413, 1999 WL 1244007 ¶¶ 33, 35, 43 (Dec. 23, 1999) ("Advanced Services December 23, 1999 Order"). See MTS/WATS Market Structure Order, 97 FCC 2d at 715. Notice of Proposed Rulemaking, In the Matter of Amendments to Part 69 of the Commission's Rules Relating to Enhanced Service Providers, CC Docket No. 87-215, ¶ 7 ("1987 NPRM"), released July 17. 1987; Docket No. 87-215 (the "ESP Exemption Order") released in 1988. See Declaratory Ruling in CC Docket No. 96-98 in Notice of Proposed Rulemaking in CC Docket No. 96-68, In re: Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; Inter-Carrier Compensation for ISP-bound Traffic, 14 FCC rcd 3689, 3697 ¶ 12 (1999) ("Declaratory Ruling"), rev'd Bell Atlantic Telephone Companies v. FCC, Nos. 99-1094 et al. 2000 WL 273383 (D.C. Cir. March 24, 2000).

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 21 Page 2 of 2

RESPONSE: (continued)

- b. The CLEC charges the ESP/ISP for the access service it receives. The ESP/ISP is the CLEC's customer. For ESP/ISP service, the end user accessing the ESP/ISP service is a customer of the ESP/ISP, not of the local exchange company.
- c. See BellSouth's Response to MCI WorldCom's 1st Interrogatories, Item No. 21(a).

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 22 Page 1 of 1

REQUEST:

What provision in BellSouth's interconnection agreement with MCI WorldCom or in BellSouth's tariffs relate in any way to the meaning of the term "local traffic?" Please identify such provisions with specificity.

RESPONSE: The Interconnection Agreement (Attachment IV, Section 2.2.1) executed by the parties contains the following definition of local traffic:

> "Local traffic is defined as any telephone call that originates in one exchange and terminates in either the same exchange, or a corresponding Extended Area (EAS) exchange. The terms Exchange and EAS are defined and specified in Section A3. of BellSouth's General Subscriber Service Tariff."

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 23 Page 1 of 1

REQUEST: Where does a call to an ESP terminate? Explain.

RESPONSE: BellSouth is responding to this question as it pertains to Internet Service Providers (ISPs) that are a subset of ESPs since ISP-bound traffic is the issue in this case.

In its December 23, 1999 Order on Remand, In re: Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket Nos. 98-147, ¶ 33, the FCC stated:

"As we have previously found in the Reciprocal Compensation Order, xDSL-based advanced services that are used to connect ISPs with their subscribers to facilitate Internet bound traffic typically constitute exchange access service because the call initiated by the subscriber terminates at Internet websites located in other exchanges, states, or foreign countries."

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REQUEST:

By industry custom, it has been stated that a call is considered terminated on the PSTN when it is handed off at the terminating carrier's switch and delivered to the called party's premises, establishing a connection with the called party, with answer supervision returned and a call record generated.

- a. Does BellSouth agree that the statement applies for billing purposes in the context of a call placed to an end user other than an ESP? If not, explain.
- b. Does BellSouth agree that that statement applies for billing purposes in the context of a call placed to an ESP? If not, explain.
- c. If BellSouth agrees that that statement applies in one context but not in the other, explain what differences in the contexts support such a distinction.

RESPONSE: a.

- a. No. For billing purposes, the network action that is significant is when the call is completed. Call records are generated at the time a completed call disconnects not when it terminates. The information indicating the timing and duration of a call is generally controlled by the date and time the call is completed.
- b. No. For billing purposes, the network action that is significant is when the call is completed. Call records are generated at the time a completed call disconnect not when it terminates. The information indicating the timing and duration of a call is generally controlled by the date and time the call is completed.
- c. N/A.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 25 Page 1 of 1

REQUEST:

Describe in detail the basis on which BellSouth has disputed and withheld payment of MCI WorldCom invoices for reciprocal compensation from the first such invoice to the present time.

RESPONSE: BellSouth objects to this Interrogatory to the extent that it seeks information on disputes other than ISP-bound traffic on the grounds that such request is overly broad and unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving this objection, BellSouth states that it has never intentionally included ISP minutes of use because it is not included in the definition of local traffic in the agreement, therefore reciprocal compensation is not owed. BellSouth has attached hereto its ISP MOU estimation process, which details the procedures for invoice dispute.

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BST ISP MOU Estimation Process

Estimation of ISP minutes of use are based on the following.

- 1. All calls originating from BellSouth Telecommunications (BST), terminating to a CLEC, are recorded in each BST central office, this data is collected via ETCS (Electronic Toll Collection System) and sent to ALPHA for processing. Alpha is the front end processing for all Automatic Message Accounting (AMA) data.
- 2. This data is stored in the 12 TSO (RAO) sites (e.g., State, except Florida, where there are three sites and Georgia two sites).
- 3. These sites store this data by OCN, NPA, NXX, Call type, Message date, number of messages, and minutes of use.
- 4. This data is then sorted (via DB2 Queries) to extract Local and IntraLata Toll calls by the groupings listed above. As a function of the query, a calculation of call message hold times (i.e., Total MOU/Total Messages) yields an average call holding time.
- 5. BellSouth has attempted to obtain a list of ISP access numbers from all sources. It has only been able to obtain a fraction of such access numbers. The CLEC's disagree with the basic premise that ISP minutes of use are interstate in jurisdiction. However, with the ISP access numbers it possesses, BellSouth determines the number of known ISP MOUs and uses the process in steps 6, 7 and 8 to estimate the remainder.
- 6. From external industry and internal BST studies, it was determined that the average holding times for ISP and Local/IntraLata messages were 20 minutes and 3-4 minutes respectively.
- 7. The Company then made the assumption, based on the above industry standard, that where the average call hold time for a CLEC is 15 minutes or greater by NPA/NXX, this would be considered a reasonable cutoff for "estimated ISP minutes of use".
- 8. A summation of all minutes of use for each NPA/NXX is calculated, and is then divided by the total messages for that NPA/NXX to determine those that meet the 15 minute criteria. The result is the total minutes of use that BST estimates terminate to an ISP.

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- 9. The above estimated ISP minutes of use are then put in dispute with the CLEC involved, and the Interconnection Purchasing Center (IPC) pays the balance of the invoice.
- 10. This estimation process is subject to the CLEC providing factual ISP usage information to BellSouth and having BellSouth true up the invoiced dollars.

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REQUEST:

- a. What is an ESP? Is an ESP an "end user?"
- b. What is an ISP? Is an ISP an "end user?"

RESPONSE: a. An ESP is an Enhanced Service Provider as defined in 47 C.F.R. Section 64.702(a). No, an ESP is not an end user.

b. An ISP is an Internet Service Provider or an Information Service Provider. ISPs are a subset of an Enhanced Service Providers and are not end users.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 27 Page 1 of 2

REQUEST: Does BellSouth switch or treat traffic bound to an ESP served by MCI WorldCom any differently from any other traffic originated on BellSouth's network for delivery to a non-ESP customer served by MCI WorldCom?

a. If it does, describe in detail how it is switched or treated differently, why it is switched or treated differently and describe all facilities used for the transport and termination of that traffic that are different from the facilities used to transport and terminate non-ESP traffic.

RESPONSE: ISP-bound traffic is normally 7-digit dialed by the originating end user (except in local calling areas using 10-digit dialing) and appears to the network equipment as a local call in the same manner as originating Feature Group A switched access calls or IP Telephony switched access calls appear as local calls. The network cannot distinguish these interstate access calls from true local calls from either a switching or trunking perspective unless they are assigned to unique NPA/NXXs. I am unaware of this being the case with MCI WorldCom. Since there are no technically feasible ways to differentiate 7-digit dialed switched access calls from true 7-digit dialed or 10-digit dialed local-calls, the network must treat them the same when they are being delivered to the same MCI WorldCom location. Therefore, the trunk group over which a call is routed is clearly not indicative of its jurisdiction. Nor can the BellSouth network determine where the call is terminated once the call is handed off to MCI WorldCom.

For example, on 7-digit dialed calls between BellSouth end users, whether true local or internet, BellSouth normally routes those calls directly between BellSouth end offices, thereby utilizing only two end office switches and minimum transport facilities. However, since MCI WorldCom and other CLECs have elected to deploy their networks using fewer, more centralized switches and may have only one Point Of Interface for a LATA, BellSouth must first route the 7-digit calls to a BellSouth Access Tandem switch (if a direct end office to end office trunk group does not exist) using the BellSouth toll network, switch the calls through the tandem, then route to a trunk group destined to MCI WorldCom's Point Of Interface. BellSouth has deployed several direct end

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office to end office trunk groups to MCI WorldCom. These trunk groups, with the exception of some in Tennessee, overflow to the toll network. If a direct end office trunk group does not exist, the call routes directly to the toll network as described above. Tennessee is an exception since BellSouth has chosen to overflow CLEC traffic through BellSouth's local tandem rather than BellSouth's access tandem. This adds_considerable network switching (both the originating end office and a tandem switch) and transport costs to BellSouth. Additionally, whereas BellSouth has distributed internet traffic on a web of transport facilities directly between BellSouth end offices to avoid network congestion, this is not the case with internet traffic delivered to MCI WorldCom and most other CLECs. Concentrating traffic (particularly internet traffic) to a small number of MCI WorldCom Points of Interfaces in a given LATA results in significant traffic congestion at the tandem switches and uneconomical use of transport facilities.

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REQUEST:

If it is BellSouth's position that it did not intend that ESP traffic would be subject to reciprocal compensation payment under its interconnection agreements with MCI WorldCom, identify what provisions, or provisions, if any, in those agreements support that position and explain why they do.

RESPONSE: In the Interconnection between BellSouth and MCI:

Attachment I, Section 7.1 states: "Compensation for the exchange of local traffic is set forth in Table 1 of this Attachment and shall be billed based on per-minutes-of-use and shall be measured in accordance with Attachment IV.

Attachment IV, Section 2.2.1 states: "The parties shall bill each other reciprocal compensation at the rates set forth for Local Interconnection in this Agreement and the Order of the TRA. Local traffic is defined as any telephone call that originates in one exchange and terminates in either the same exchange, or a corresponding Extended Area (EAS) exchange. The terms Exchange and EAS exchanges are defined and specified in Section A3. of BellSouth's General Subscriber Service Tariff."

Other applicable provisions include, but are not limited to: Part A, p. 1 the 5th WHEREAS clause; Part A, Section 6 - Compliance with Laws and Part A, Section 7 – Governing Law.

These provisions support that BellSouth never intended to include ESPbound traffic under the reciprocal compensation obligations of the agreements, since they clearly state that the obligations applied only to local traffic.

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REQUEST:

- a. At any time during the negotiations leading to the Agreement, did BellSouth state an intention to exclude ESP traffic from the parties' reciprocal compensation obligations? If BellSouth contends that it stated such an intention, identify the circumstances under which it advised MCI WorldCom of its intention including, the person(s) who made the statement(s), the person(s) the statements were made to, the date(s) the statement(s) was(were) made, the substance of the statement(s) and all documents which reflect, refer or related to such statement(s).
- b. At any time during the negotiations leading to the November 1996 Agreement, did MCI WorldCom state an intention to exclude ESP traffic from treatment as local traffic for reciprocal compensation purposes? If BellSouth contends that MCI WorldCom stated such an intention, identify the circumstances under which it advised BellSouth of its intention including, the person(s) who made the statement(s), the person(s) the statements were made to, the date(s) the statement(s) was(were) made, the substance of the statement(s) and all documents which reflect, refer or related to such statement(s).

RESPONSE:

- a. BellSouth did not state such an intention nor should it have had to specifically exclude ESP-bound traffic from the reciprocal compensation arrangements. Reciprocal compensation only applies to local traffic, and ESP-bound traffic is clearly interstate access traffic. Therefore, BellSouth saw no need to specifically exclude traffic that was by nature excluded from the definition of traffic subject to reciprocal compensation.
- b. MCI WorldCom never raised the issue of treating ESP-bound traffic as local for purposes of reciprocal compensation under the interconnection agreement.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 30 Page 1 of 1

REQUEST:

Does BellSouth agree that, notwithstanding the FCC's declaration early last year that ISP traffic is jurisdictionally mixed and substantially interstate, state commissions may determine that such traffic is subject to the reciprocal compensation provisions of interconnection agreements? Explain.

RESPONSE:

BellSouth agrees that state commissions may determine that parties to an interconnection agreement voluntarily agreed to pay reciprocal compensation for ISP traffic consistent with the terms of such agreements. However, BellSouth does not agree that a state commission can lawfully require a party to pay reciprocal compensation for ISP traffic pursuant to an interconnection agreement under which the parties did not mutually agree to make such payments.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 31 Page 1 of 1

REQUEST:

Is ESP traffic originated by BellSouth end users transported by MCI WorldCom's network via trunks carrying jurisdictionally mixed traffic?

RESPONSE: BST establishes a Local/Toll (L/T) trunk group to MCI WorldCom to deliver BST originated 7-digit and 10-digit dialed traffic to MCI WorldCom that appears to the BST network elements as either local or intraLATA toll traffic. Since some interstate and/or access traffic is 7digit dialed, such as originating Feature Group A, Internet and IP Telephony, such calls may appear "local" to the BST network equipment and therefore are routed to MCI WorldCom over the BST L/T trunk group. However, this in no way indicates the jurisdiction of such traffic or where such traffic terminates. Additionally, switched access traffic to MCI WorldCom via a BellSouth ported number is routed to MCI WorldCom via the BST L/T trunk group due to Local Number Portability technical limitations. MCI WorldCom certainly expects this traffic to be treated as access traffic, not local.

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REQUEST:

Has BellSouth or anyone else, prepared any cost studies demonstrating the cost differences, if any, between transporting and terminating ESP-bound traffic and other types of local traffic.

RESPONSE: Cost studies have not been prepared. However, there are studies documenting the differences in the holding times associated with voice traffic and Internet traffic, which result in a difference in the cost of handling these two types of traffic. These studies include: (1) Report of the NARUC Internet Working Group, "Pricing and Policies for Internet Traffic on the Public Switched Network" (March 1998); (2) Atai and Gordon, "Impacts of Internet Traffic on LEC Networks and Switching Systems" (Bellcore 1996); and (3) Atai and Gordon, "Architectural Solutions to Internet Congestion Based on the SS7 and Intelligent Network Capabilities" (Bellcore 1997).

> Because of the longer holding times for ISP-bound traffic, the payment of reciprocal compensation for ISP-bound traffic based on the rates for transporting and terminating traditional local voice traffic will result in an over-recovery of call setup costs. In its Declaratory Ruling, the Federal Communications Commission ("FCC") recognized that "efficient rates for inter-carrier compensation for ISP-bound traffic are not likely to be based entirely on minute-of-use pricing structures." (Declaratory Ruling, at ¶ The FCC expressed concern that "pure minute-of-use pricing structures are not likely to reflect accurately how costs are incurred for delivering ISP-bound traffic." (Id.)

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REQUEST:

Does BellSouth contend that it would violate any federal law or rules if this Commission were to find that, under MCI WorldCom and BellSouth interconnection agreements, traffic bound for ESPs is subject to the reciprocal compensation provisions of the agreements?

If so, which federal law or rules would be violated and how? a.

RESPONSE: Yes. Because BellSouth and MCI WorldCom did not mutually agree to pay reciprocal compensation for ISP traffic under this interconnection agreement, it would violate the Telecommunications Act of 1996 for the Authority to order BellSouth to make such payments.

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REQUEST:

Does BellSouth allow ESPs to collocate their equipment in BellSouth central offices? If the answer to this question is anything other than unequivocal "No," please identify the ESPs that are currently collocated in BellSouth central offices, including the BellSouth central offices that currently house collocation arrangements between BellSouth and ESPs.

RESPONSE: No.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Interrogatories April 14, 2000 Item No. 35 Page 1 of 1

REQUEST:

Does BellSouth agree that the provisions in the MCI WorldCom and BellSouth interconnection agreements regarding the treatment of local traffic favor neither MCI WorldCom nor BellSouth and are of potentially equal benefit to both?

RESPONSE: As for negotiation of this agreement, the terms reflect a give and take by the parties and as such, certain conditions negotiated may have been more favorable to one party than the other.

> Though the definition of Local Traffic in this interconnection agreement does not appear to benefit either party, it clearly excludes ISP traffic. It states "Local Traffic is defined as any telephone call that originates in one exchange and terminates in either the same exchange, or a corresponding Extended Area (EAS) exchange." Since ISP traffic does not terminate at the ISP, but continues on to the World Wide Web, it is clear that the Parties intended that ISP traffic be considered interstate in nature. Any other interpretation would unduly benefit MCI WorldCom.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Request for Production April 14, 2000 Item No. 1 Page 1 of 1

REQUEST:

Please produce all documents identifying ESPs served by BellSouth in Tennessee and indicating whether those ESPs purchase their services from BellSouth's interstate or intrastate tariffs.

RESPONSE: BellSouth objects to this request for production on grounds that the information requested is not relevant to any issue in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. BellSouth also objects to this request on grounds that it is overly broad and unduly burdensome in that every invoice ever issued by BellSouth to an ESP served by BellSouth would be responsive to this request.

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REQUEST: Please produce all documents which reflect, refer or relate in any way to

the document, "CLEC Policy - Unintended Consequences," dated

11/14/97, attached hereto as Exhibit A.

RESPONSE: BellSouth has no responsive documents.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Request for Production April 14, 2000 Item No. 3 Page 1 of 1

REQUEST:

Please produce all documents which reflect, refer to relate to August 12, 1997 memo from Ernest Bush to CLECs and all documents which reflect, refer or relate to the decision to send that memo.

RESPONSE: BellSouth objects to this Request for Production on the grounds that it is overly broad and unduly burdensome to the extent it seeks every document that may "reflect, refer, or relate to the decision" to send the August 12, 1997 memo from Ernest Bush. BellSouth also objects to this Request to the extent it seeks the production of public documents or documents protected by the attorney-client privilege or work product doctrine. Subject to, and without waiving the foregoing objections, see BellSouth's response to MCI WorldCom's 1st Request for Production, Item No. 4.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Request for Production April 14, 2000 Item No. 4 Page 1 of 1

REQUEST:

Please produce all documents which reflect, refer or relate to any discussions held by or within the group, committee, entity or project known as Project Harmonize pertaining to the subject of reciprocal compensation for ESP traffic.

RESPONSE: BellSouth objects to this Request for Production on the grounds that it is overly broad and unduly burdensome to the extent it requests every document prepared by any individual member or participant of Harmonize on the issue of ISP-bound traffic. BellSouth also objects on the grounds that such documents are not relevant to any issue in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, BellSouth also objects to this request to the extent is seeks the production of documents protected by the attorney-client privilege or the work product doctrine. Subject to and without waiving these objections, BellSouth states that it will produce non-privileged documents responsive to this request only upon the entry of an acceptable protective order.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Request for Production April 14, 2000 Item No. 5 Page 1 of 1

REQUEST:

Please produce all documents which reflect, refer or relate to any and all discussions within BellSouth on the subject of reciprocal compensation for ESP traffic which occurred during the period January 1, 1995 through and including the present.

RESPONSE: BellSouth objects to this Request for Production on the grounds that it is overly broad and unduly burdensome to the extent it seeks every document generated by any employee at BellSouth on the subject of ISPbound traffic for the past five years. BellSouth also objects on the grounds that such documents are not relevant to any issue in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. BellSouth also objects to this Request for Production to the extent it seeks the production of documents protected by the attorney-client privilege or the work product doctrine.

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REQUEST:

All documents which reflect, refer or pertain to any efforts BellSouth has made to meter traffic to ESPs, or otherwise segregate such traffic from other traffic.

RESPONSE:

- 1) CRIS / CABS Work Request Submitted June 16, 1997 detailing the requirements which were developed to identify and drop from billing ISP traffic.
- 2) E-Mail dated September 11, 1997 from Sheri Irvin, Specialist BBI Wholesale Billing, describing requirements for reports for dropped ISP usage.
- 3) E-Mail Message from Pinky Reichert dated October 7, 1997 addressing issues with ISP process.
- 4) E-Mail Message Dated October 24, 1997 from Susan Claytor, Manager BBI Wholesale Billing describing ongoing efforts to refine the ISP process.
- 5) CRIS / CABS Work Request Submitted November 5, 1997 detailing the requirements to provide reports of dropped ISP traffic.
- 6) E-Mail Message from Bob Cunningham, Manager Network and Carrier Services dated December 16, 1997 containing the CRIS / CABS Work Request Submitted December 12, 1997 detailing the requirements to change the manner in which usage records for ISP traffic are stored.
- 7) E-Mail Message from Bob Cunningham, Manager Network and Carrier Services dated December 16, 1997 containing the CRIS / CABS Work Request Submitted December 16, 1997 detailing the requirements to change the manner in which 800 traffic terminating to ISP numbers is treated.
- 8) Letter from Dave Hollett, Senior Director BBI Wholesale Billing dated March 5, 1998 describing implementation of billing changes to support ISP orders in North Carolina and Florida.

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RESPONSE: (continued)

- 9) Implementation Guide dated September 8, 1998 highlighting the changes which were implemented in CABS to identify ISP usage on CLEC CABS bills.
- 10) An undated spreadsheet containing the test scripts used to verify that the CABS changes implemented to identify ISP usage on CLEC bills was installed correctly.
- 11) Georgia warehouse project documents.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Request for Production April 14, 2000 Item No. 7 Page 1 of 1

REQUEST:

Please produce all documents which reflect, refer or pertain to any studies, tests, analyses, reports or other efforts you have undertaken to determine the accuracy of any mechanism in place for metering or otherwise segregating ESP traffic from other traffic.

RESPONSE: See BellSouth's Response to MCI WorldCom's 1st Request for

Production, Item No. 6.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Request for Production April 14, 2000 Item No. 8 Page 1 of 1

REQUEST:

Please produce all documents which reflect refer or pertain to the minutes of use, as recorded by BellSouth, for which MCI WorldCom has terminated traffic in Tennessee from BellSouth customers to ESPs, pursuant to all interconnection agreements between BellSouth and MCI WorldCom, from the date of the agreement to the present.

RESPONSE: BellSouth objects to this Request for Production to the extent that it suggests that calls from BellSouth customers are "terminated" to ISPs served by MCI WorldCom. BellSouth also objects to this request on the grounds that it is overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, see the attached documents.

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Item No. 8 ATTACHMENT

January, 1998 CLEC Usage Summary

Tennessee 7229 MCIMETRO, ATS, INC. 2,217	,023	0	0.00%	95.81%
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- 1 Total MOU's shown are actual the month MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local and intralata MOU's only.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder is intralata MOU's)

February, 1998 CLEC Usage Summary

Tennessee 7229 MCIMETRO, ATS, INC. 2,674,622 0 0.00% 94.55%

- 1 Total MOU's shown are actual the month MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local and intralata MOU's only.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder is intralata MQU's)

March, 1998 CLEC Usage Summary

Tennessee 7229 MCIMETRO, ATS, INC. 3,316,434 0 0.00% 95.79%

- 1 Total MOU's shown are actual the month MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local and intralata MOU's only.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder is intralata MOU's)

April, 1998 CLEC Usage Summary

Tennessee 7229 MCIMETRO, ATS, INC. 4,010,586 0 0.00% 96.81%

- 1 Total MOU's shown are actual the month MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local and intralata MOU's only.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder is intralata MOU's)

May, 1998 CLEC Usage Summary

Tennessee 7229 MCIMETRO, ATS, INC.	5,593,278	0	0.00%	97.55%

- 1 Total MOU's shown are actual the month MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local and intralata MOU's only.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder is intralata MOU's)

June, 1998 CLEC Usage Summary

Tennessee 7229 MCIMETRO, ATS, INC.	6,630,219	0	0.00%	97.52%

- 1 Total MOU's shown are actual the month MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local and intralata MOU's only.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder is intralata MOU's)

July, 1998 CLEC Usage Summary

Tennessee 7229 MCIMETRO, ATS, INC. 7,756,052 0 0.00% 97.98%

- 1 Total MOU's shown are actual the month MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local and intralata MOU's only.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder is intralata MOU's)

August, 1998 CLEC Usage Summary

Tennessee 7229 MCIMETRO, ATS, INC. 9,029,218 0 0.00% 98.53%

- 1 Total MOU's shown are actual the month MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local and intralata MOU's only.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder is intralata MOU's)

September, 1998 CLEC Usage Summary (Revised)

Tennessee 7229 MCIMETRO, ATS, INC.	10.385,142	0	0.00%	98.30%
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- 1 Total MOU's shown are actual the month MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local and intralata MOU's only.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder is intralata MOU's)

October, 1998 CLEC Usage Summary

Tennessee 7229 MCIMETRO, ATS, INC. 10,991,714 0 0.00% 88.08%

- 1 Total MOU's shown are actual MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local, intralata and RCF MOU's.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder are intralata or RCF interstate MOU's)

November, 1998 CLEC Usage Summary

Tennessee 7229 MCIMETRO, ATS, INC.	12.325,590	0	0.00%	90.14%
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- 1 Total MOU's shown are actual MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local, intralata and RCF MOU's.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder are intralata or RCF interstate MOU's)

December, 1998 CLEC Usage Summary

Tennessee	Т	7220 MCMETEO 470 MG			•	
1.0	ı	7229 MCIMETRO, ATS, INC.	12,719,471	0	0.00%	90 73%

- 1 Total MOU's shown are actual MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local, intralata and RCF MOU's.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder are intralata or RCF interstate MOU's)

January, 1999 CLEC Usage Summary

Tennessee

7229 MCIMETRO ATS INC

14.346,441 7,173,221 50.00%

91.23%

13,088,094

- 1 Total MOU's shown are actual MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local, intralata and RCF MOU's.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder are intralata or RCF interstate MOU's)

February, 1999 CLEC Usage Summary (Revised 5/25/99)

Tennessee

WUA MCI Metro

13,180,461 11,862,415 90.00% 90.86% 11,975,752

- 1 Total MOU's shown are actual MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local, intralata and RCF MOU's.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder are intralata or RCF interstate MOU's)

March, 1999 CLEC Usage Summary (Revised 5/25/99)

Tennessee

WUA MCI Metro

15,296,079

13,766,471

90.00%

07%

13,915,471

- 1 Total MOU's shown are actual MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local, intralata and RCF MOU's.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder are intralata or RCF interstate MOU's)

April, 1999 CLEC Usage Summary

Tennessee

WUA MCI Metro

14,830,114 13,347,103

90.00% 91.39% 13.553,439

- Total MOU's shown are actual MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- Total MOU represents local, intralata and RCF MOU's.
- Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder are intralata or RCF interstate MOU's)

May, 1999 CLEC Usage Summary

Tennessee

WUA MCI Metro 14,893,922 13,404,530 90.00% 93.04% 13,857,378

- 1 Total MOU's shown are actual MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local, intralata and RCF MOU's.
- Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder are intralata or RCF interstate MOU's)

June, 1999 CLEC Usage Summary

Tennessee

WUA MCI Metro 16,004,709 12,003,532 75.00% 92.27% 14,767,628

- 1 Total MOU's shown are actual MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local, intralata and ILNP MOU's.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder are intralate or ILNP interstate MOU's)

July, 1999 CLEC Usage Summary (Revised)

Tennessee

WUA MCI Metro 19,115,136 14,336,352 75.00% 84.61% 16,172,660

- 1 Total MOU's shown are actual MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.
- 3 Total MOU represents local, intralata and ILNP MOU's.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder are intralata or ILNP interstate MOU's)

August, 1999 CLEC Usage Summary (Revised)

Tennessee

WUA MCI Metro

18,281,861 13,711,396 75.00% 84.65% 15,475,120

- 1 Total MOU's shown are actual MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using MOU's known to be terminated to ISP telephone numbers and message holding times of extended duration.

September, 1999 CLEC Usage Summary

Tennessee

WUA MCI Metro 13,834,222 10,375,667 75.00% 95.37% 13,193,303

- 1 Total MOU's shown are actual MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using a 10 step process developed in July 1998 based on the average call hold times.
- 3 Total MOU represents local, intralata and ILNP MOU's.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's n to determine local only MOU's (remainder are intralata or ILNP interstate MOU.

October, 1999 CLEC Usage Summary (Revised)

Tennessee

WUA MCI Metro

16,878,703

14,346,898

85%

97.96% 16

16,533,840

Notes:

- 1 Total MOU's shown are actual MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using a 10 step process developed in July 1998 based on the average call hold times.
- 3 Total MOU represents local, intralata and ILNP MOU's.
- Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder are intralata or ILNP interstate MOU's)

Private/Proprietary not for disclosure outside of BellSouth without written agreement.

November, 1999 CLEC Usage Summary

Tennessee

WUA MCI Metro 28.523,421 24,244,908 85% 98.88% 28,205,159

- 1 Total MOU's shown are actual MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using a 10 step process developed in July 1998 based on the average call hold times.
- 3 Total MOU represents local, intralata and ILNP MOU's.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder are intralata or ILNP interstate MOU's)

December, 1999 CLEC Usage Summary

Tennessee

WUA MCI Metro

34,054,688

28,946,485

85%

99.16% 33,

33,768,769

- 1 Total MOU's shown are actual MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using a 10 step process developed in July 1998 based on the average call hold times.
- 3 Total MOU represents local, intralata and ILNP MOU's.
- 4 Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder are intralata or ILNP interstate MOU's)

January, 2000 CLEC Usage Summary

Tennessee

MCI Metro

42,245,837

33,796,670

80%

99.16%

41,892,515

- 1 Total MOU's shown are actual MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using a 10 step process developed in July 1998 based on the average call hold times.
- 3 Total MOU represents local, intralata and ILNP MOU's.
- Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder are intralata or ILNP interstate MOU's)

February, 2000 CLEC Usage Summary

Tennessee

MCI Metro

46,863,249

37,490,599

80%

99.30% 46,534,306

- 1 Total MOU's shown are actual MOU's from AMA tapes identified as calls terminating to CLEC numbers.
- 2 ISP MOU's were estimated using a 10 step process developed in July 1998 based on the average call hold times.
- 3 Total MOU represents local, intralata and ILNP MOU's.
- Percent local can be used with either Total MOU or estimated ISP MOU's column to determine local only MOU's (remainder are intralata or ILNP interstate MOU's)

March, 2000 CLEC Usage Summary

Tennessee

MCI Metro | 48,863,958 | 39,091,166 | 80% | 99.33% | 48,538,289 |

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Request for Production April 14, 2000 Item No. 9 Page 1 of 1

REQUEST:

Please produce all documents which reflect, refer or pertain to the minutes of use, as recorded by BellSouth for which BellSouth has terminated traffic from MCI WorldCom customers in Tennessee to ESPs served by BellSouth in Tennessee pursuant to the Interconnection Agreement between BellSouth and MCI WorldCom, from the date of the agreement to the present.

RESPONSE: BellSouth objects to this Request to the extent that it suggests that calls from MCI WorldCom customers are terminated to ISPs served by BellSouth. BellSouth also objects to this request on grounds that it is overly broad and unduly burdensome and that documents concerning minutes of use from MCI WorldCom to BellSouth are not relevant to any issue in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, see the attached documents.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 99-00662
MCI WorldCom's 1st Request for Production
April 14, 2000
Item No. 9 ATTACHMENT

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 99-00662
MCI WorldCom's 1st Request for Production
April 14, 2000
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SUM

				DOM
STATE	ACNA	MONTH	YEAR	ISP MOU
T				**************
TN	AUW	10	1998	92088
TN	WUA	11	1998	410038
TN	WUA	12	1998	407596
TN	AUW	1	1999	402104
TN	WUA	2	1999	416287
TN	AUW	3	1999	328535
TN	AUW	4	1999	377211
TN	WUA	5	1999	282300
TN	WUA	6	1999	300644
TN	WUA	7	1999	298031
TN	WUA	8	1999	315868
TN	WUA	9	1999	296652
TN	WUA	10	1999	304598
TN	WUA	11	1999	218541
TN	AUW	12	1999	168624
TN	WUA	1	2000	152845
TN	WUA	2	2000	163769
TN	WUA	3	2000	142816
		_		
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BellSouth Telecommunications, Inc.
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		ACCT			SUM
STATE	ACNA	NUM	MONTH	YEAR	ISP MOU
TN	WUA	9018100170	10	1998	92088
TN	AUW	9015100170	11	1998	
TN	WUA	9015100170	12	1998	410038
TN	WUA	9015100170	1	1999	407596
TN	AUW	9015100170			402104
TN	WUA		2	1999	416287
TN		9015100170	3	1999	328535
	WUA	9015100170	4	1999	377211
TN	WUA	9015100170	5	1999	282300
TN	WUA	901S100170	6	1999	300644
TN	AUW	901S100170	7	1999	298031
TN	WUA	9018100170	8	1999	315868
TN	WUA	9015100170	9	1999	296652
TN	AUW	901\$100170	10	1999	304598
TN	WUA	9015100170	11	1999	218541
TN	WUA	9018100170	12	1999	
TN	WUA	9015100170	1		168624
TN	WUA	9018100170	2	2000	152845
TN	WUA	9018100170		2000	163769
114	MOM	3072700110	3	2000	142816
					5078547

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Request for Production April 14, 2000 Item No. 10 Page 1 of 1

REQUEST:

Please produce all documents which reflect, refer or pertain to BellSouth's withholding payment for all or part of any MCI WorldCom invoices for reciprocal compensation from the first such invoice to the present time.

RESPONSE: Documents responsive to this request for production are voluminous and will therefore be made available for review and inspection at 333 Commerce Street, Suite 2101, Nashville, Tennessee 37201-3300.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Request for Production April 14, 2000 Item No. 11 Page 1 of 1

REQUEST:

Please produce all documents which reflect, refer or pertain to any cost studies prepared by or on behalf of BellSouth demonstrating the cost differences, if any, between transporting and terminating ESP-bound traffic and other types of local traffic on BellSouth's network or any other network.

RESPONSE: See BellSouth's Response to MCI WorldCom's First Interrogatories, Item No. 32.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Request for Production April 14, 2000 Item No. 12 Page 1 of 1

REQUEST:

All documents which reflect, refer or pertain to any statements BellSouth has made that BellSouth intended to exclude ESP traffic from its reciprocal compensation obligations to MCI WorldCom during the negotiations leading to the Agreement.

RESPONSE: No such documents exist. See BellSouth's Response to MCI WorldCom's 1st Interrogatories, Item No. 29.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Request for Production April 14, 2000 Item No. 13 Page 1 of 1

REQUEST:

Please produce all documents which reflect, refer or relate to any decision

by BellSouth not to pay reciprocal compensation to MCI WorldCom for

ESP traffic or any other traffic.

RESPONSE: See attached documents.

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 99-00662 MCI WorldCom's 1st Request for Production April 14, 2000 Item No. 14 Page 1 of 1

REQUEST:

Please produce all documents which reflect, refer or relate to any decision by BellSouth not to pay reciprocal compensation to MCI WorldCom for ESP traffic or any other traffic.

RESPONSE: See BellSouth's Response to MCI WorldCom's 1st Request for Production, Item No. 13.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
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MCI WorldCom's 1st Request for Production
April 14, 2000
Item No. 15
Page 1 of 1

REQUEST NO. 14:

Please produce all documents which reflect, refer or relate to any communications between BellSouth and any other person or entity concerning the payment or non-payment of any reciprocal compensation invoiced by MCI WorldCom for services rendered in Tennessee.

RESPONSE:

See documents provided in response to MCI WorldCom's 1st Request for Production of Documents, Item No. 8.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
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MCI WorldCom's 1st Request for Production
April 14, 2000
Item No. 16
Page 1 of 1

REQUEST: Please produce all documents which you identified, or upon which you

relied, in preparing your answers to MCI WorldCom's First Set of

Interrogatories to BellSouth in this matter.

RESPONSE: BellSouth has no additional documents responsive to this request.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 99-00662
MCI WorldCom's 1st Request for Production
April 14, 2000
Item No. 17
Page 1 of 1

REQUEST: Please produce the "Georgia Data Warehouse Study." Refer to

Interrogatory No. 11, First Set.

RESPONSE: See BellSouth's Response to MCI WorldCom's 1st Request for

Production, Item No. 6.